## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CHRISTOPHER KELLY, individual and on behalf of all others similarly situated,

Plaintiff,

v.

VERIZON PENNSYLVANIA, LLC, VERIZON ONLINE PENNSYLVANIA PARTNERSHIP, and VERIZON PENNSYLVANIA,

Defendants.

Civil Action No.

#### NOTICE OF REMOVAL

Defendants Verizon Pennsylvania, LLC and Verizon Online LLC (as successor to Verizon Online Pennsylvania Partnership) (collectively, "Verizon"), pursuant to 28 U.S.C. § 1441, hereby remove this action to this Court from the Court of Common Pleas of Philadelphia County. This action is within the original jurisdiction of this Court and properly removed based on the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C. §§ 1332, 1446, and 1453. Pursuant to 28 U.S.C. § 1446(d), copies of this Notice of Removal will be served upon counsel for Plaintiff Christopher Kelly ("Plaintiff") and filed with the Office of Judicial Records of the Court of Common Pleas for the County of Philadelphia, as an exhibit to a Notice to State Court of Removal to Federal Court.

## PROCEDURAL HISTORY AND TIMELINESS OF REMOVAL

1. On September 28, 2016, Plaintiff commenced this action by filing a putative class action Complaint against Verizon Pennsylvania, LLC, Verizon Online Pennsylvania Partnership, and "Verizon Pennsylvania" (collectively, "Defendants") in the Court of Common Pleas for

Philadelphia County, captioned *Christopher Kelly v. Verizon Pennsylvania, LLC, et al.*, Case No. 16-0903521.

- 2. Verizon Pennsylvania, LLC received a copy of the Complaint on October 4, 2016. Verizon Online LLC received a copy of the Complaint on October 3, 2016. The Complaint is the initial pleading setting forth the claim for relief upon which this action is based. Accordingly, this Notice is timely pursuant to 28 U.S.C. § 1446(b). Pursuant to 28 U.S.C. § 1446(a), true and correct copies of all process, pleadings, and orders served upon Verizon in this action are attached to this Notice as Exhibit A.
- 3. The Court of Common Pleas for the County of Philadelphia is located within the Eastern District of Pennsylvania. 28 U.S.C. § 110. This Notice of Removal is therefore properly filed in this Court pursuant to 28 U.S.C. § 1441(a).

## ALLEGATIONS OF THE COMPLAINT

- 4. This is a putative class action on behalf of Plaintiff and other customers of Verizon.
- 5. Plaintiff alleges, *inter alia*, that Verizon "required" its customers to lease multiple "set-top boxes" to utilize FiOS Quantum programing on multiple televisions but that more than one set-top box is not technologically required in order to access FiOS Quantum programing on multiple televisions, and that Verizon does not disclose to its customers the alleged availability of third-party alternatives to leasing Verizon set-top boxes. (Compl. ¶¶ 2-8);
- 6. Plaintiff seeks to represent the following putative class: "All Pennsylvania residents who are current or former customers of Defendant Verizon, who purchased FiOS with Quantum, and who have paid rental charges for the use of more than one so-called 'set-top' box to Defendant Verizon at any time from September 2011 to the present." (*Id.* ¶ 58.)

- 7. On behalf of Plaintiff and the putative class, the Complaint attempts to state claims for: (1) violations of the Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 Pa. Stat. § 201-1, et seq. ("UTPCPL"); and (2) injunctive relief. (Id. ¶¶ 65-81.)
- 8. The Complaint seeks, *inter alia*, (i) "actual and statutory damages for each instance of unfair or deceptive conduct, including, but not limited to, each instance when Verizon obfuscated the availability of third-party equipment alternatives to Verizon's set-top boxes, and/or improperly required Plaintiff and the class to lease multiple set-top boxes"; (2) declaratory and injunctive relief; (3) an accounting; (4) treble damages; (5) attorneys' fees and costs; and (6) interest. (*Id.* at pp. 26, 29.)
- 9. Verizon disputes Plaintiff's allegations, denies that the Complaint has merit, denies that the Class is certifiable, and denies that Plaintiff or the putative class has been harmed in any way.

## BASIS FOR REMOVAL

10. This action is within the original jurisdiction of this Court, and removal is proper under the Class Action Fairness Act of 2005, 28 U.S.C. § 1332(d), which grants district courts original jurisdiction over putative class actions, involving over 100 putative class members, where any member of the putative class of plaintiffs is a citizen of a State different from any Defendant, and in which the amount in controversy in the aggregate exceeds \$5 million. As set forth below, this action satisfies each of the requirements of § 1332(d)(2) for original jurisdiction under CAFA.

## Putative Class Action.

11. This action meets the CAFA definition of a class action, which is "any civil action filed under rule 23 of the Federal Rules of Civil Procedure or similar State statute or rule of judicial procedure." 28 U.S.C. §§ 1332(d)(1)(B), 1453(a) & (b). Plaintiff seeks certification of a

class under Pa.R.C.P. 1701, et seq., Pennsylvania's analog to Fed. R. Civ. P. 23. (See Compl. ¶ 57.)

## Class Consisting of More than 100 Members.

12. Verizon Pennsylvania, LLC has charged more than 100 customers for multiple settop boxes in connection with residential FiOS Quantum services in Pennsylvania. In fact, according to Verizon Pennsylvania, LLC's records, during a portion of the claimed class period, approximately 139,827 customers leased more than one set-top box in connection with their residential FiOS Quantum services in Pennsylvania. Accordingly, the aggregate number of members of the proposed class is greater than 100 persons for purposes of 28 U.S.C. § 1332(d)(5)(B).

## CAFA Diversity.

- 13. The required diversity of citizenship under CAFA is satisfied because "any member of a class of Plaintiffs is a citizen of a State different from any Defendant." 28 U.S.C. § 1332(d)(2)(A).
- 14. Defendant Verizon Pennsylvania, LLC is a Delaware limited liability company, and its sole member is Verizon Communications Inc. Verizon Communications Inc. is a Delaware corporation with its principal place of business in New York. Accordingly, Defendant Verizon Pennsylvania, LLC is a citizen of Delaware and New York.
- 15. Defendant Verizon Online Pennsylvania Partnership was merged into Verizon Online LLC in June 2013 and ceased to exist as of that date.<sup>2</sup> Verizon Online LLC, the surviving

<sup>&</sup>lt;sup>1</sup> The putative class period runs from September 2011 to the present (Compl., ¶ 58), but the services at issue, FiOS Quantum, have only been commercially available since mid-2014. The information presented in this paragraph is based on data available from June 2015 to September 2016.

Verizon reserves the right to challenge the way in which Plaintiff has identified the various defendants and Plaintiff's inclusion of improper parties as defendants.

entity, is a Delaware limited liability company, and its sole member is GTE Wireless LLC. GTE Wireless LLC is a Delaware limited liability company and its members are Verizon Communications Inc., NYNEX LLC, and Verizon Ventures LLC. NYNEX LLC is a Delaware limited liability company, and its sole member is Verizon Communications Inc. Verizon Ventures LLC is a Delaware limited liability company, and its sole member is Verizon Communications Inc. As noted above, Verizon Communications, Inc. is a Delaware corporation with its principal place of business in New York. Accordingly, Verizon Online LLC (as successor to Defendant Verizon Online Pennsylvania Partnership) is a citizen of Delaware and New York.

- unincorporated business entity called "Verizon's affiliated corporate records confirms that no unincorporated business entity called "Verizon Pennsylvania" exists, nor has ever existed, within the Verizon corporate structure. Because "Verizon Pennsylvania" is not an existing entity, it has no effect on the diversity jurisdiction of this Court. *See*, *e.g.*, *Davis v. OneBeacon Ins. Grp.*, 721 F. Supp. 2d 329, 337 (D.N.J. 2010) ("[A] defendant that is a non-existent business entity is not required to join in or consent to the removal of a case, nor is the citizenship of the non-existent entity considered for purposes of complete diversity of citizenship.") (quoting *Newsom v. Caliber Auto Transfer of St. Louis, Inc.*, 2009 WL 4506298, \*2, (S.D.Ill. Nov. 26, 2009)); *Taylor v. Piggly Wiggly of Bay Minette, Ala.*, No. 12-cv-0320-W, 2012 WL 3555576, \*3 (S.D. Ala. Aug. 16, 2012) ("the naming of a nonexistent entity cannot destroy diversity."); *see also Bernsten v. Balli Steel, PLC*, No. 08-cv-62, 2008 WL 862470, \*6 (E.D. Pa. Mar. 31, 2008) (non-existent alleged joint venture did not need to join in removal application).
  - 17. Upon information and belief, the Plaintiff is a citizen of Pennsylvania.
- 18. Along with other members of the alleged putative class, Plaintiff is not a citizen of the same states as Verizon. Accordingly, at least one proposed class member (Plaintiff) is a

citizen of a state different from a defendant, thus satisfying the minimal diversity requirements of 28 U.S.C. § 1332(d)(2)(A).

## Amount in Controversy.

- 19. Under CAFA, the claims of the individual class members are aggregated to determine if the amount in controversy exceeds the required "sum or value of \$5,000,000, exclusive of interest and costs." 28 U.S.C. §§ 1332(d)(2), (d)(6). Without conceding any merit to the Complaint's allegations or causes of action, the amount in controversy satisfies this jurisdictional threshold because under Plaintiff's theories of recovery the amount in controversy exceeds \$5 million.
- 20. The Complaint alleges that, "[a]t all times relevant hereto, Verizon charges a monthly leasing fee in connection with [set-top boxes] that ranges from \$9.99 to \$12.00" and that "Verizon currently charges \$12.00 per month for a customer's first set-top box, and \$10.00 per month for each additional box." (Compl., ¶¶ 22, 36.)
- 21. Plaintiff further alleges that, "[s]ince his service contract began in August 2014, Plaintiff consistently has been charged \$19.98 every month for the two set-top boxes. . . . After approximately two years of service, Plaintiff has paid a total of \$479.52 in lease charges, alone, for the two set-top boxes." (*Id.* at ¶¶ 49-50.)
- 22. Plaintiff further alleges that his claim is "typical" of the putative class members' claims. (Id. at  $\P$  60.)
- 23. According to Verizon Pennsylvania, LLC's records, during the period December 2015 through September 2016 (a portion of the putative class period), Verizon Pennsylvania, LLC leased approximately 2,870,014 additional set-top boxes (excluding the first set top box), month over month, associated with FiOS Quantum services at Pennsylvania residences. Because

Plaintiff alleges that customers were charged \$10.00 per month for each additional set top box (Compl.,  $\P\P$  22, 36), the amount in controversy exceeds approximately \$28,700,140.

- 24. Plaintiff asserts a claim under the UTPCPL, which permits recovery of treble damages and attorneys' fees. 73 Pa. Stat. § 201-9.2.
  - 25. Accordingly, the amount in controversy exceeds the \$5 million threshold.
- 26. Plaintiff also seeks "a declaration that Verizon has violated and continues to violate Pennsylvania law, including, but not limited to, the UTPCPL" (Compl., ¶ 80) and injunctive relief "to remedy Verizon's violations of the UTCPL [sic]." (Id. at p. 29.) The value of this relief also counts towards the amount in controversy. See Spock v. David, 469 F.2d 1047, 1052 (3d Cir. 1972) ("In cases where there is no adequate remedy at law, the measure of jurisdiction is the value of the right sought to be protected by injunctive relief").
- 27. For purposes of removal "the question is not what damages the Plaintiff will recover, but what amount is 'in controversy' between the parties." *Brill v. Countrywide Home Loans, Inc.*, 427 F.3d 446, 448 (7th Cir. 2005) ("That the Plaintiff may fail in its proof, and the judgment be less than the threshold (indeed, a good chance that the Plaintiff will fail and the judgment will be zero) does not prevent removal."). While Verizon disputes that it is liable to Plaintiff or the putative class, or that Plaintiff or the putative class suffered any injury or incurred damages in any amount whatsoever, or that any class is certifiable, for purposes of satisfying the jurisdictional prerequisites of CAFA, the matter in controversy exceeds \$5 million.

## No Joinder Necessary.

28. Defendants Verizon Pennsylvania, LLC and Verizon Online LLC jointly file this notice of removal. The other named defendant, "Verizon Pennsylvania" (which does not exist), is not required to consent to removal based on CAFA. See 28 U.S.C. § 1453(b) ("A class action . . . may be removed by any defendant without the consent of all defendants.").

## RESERVATION OF RIGHTS AND DEFENSES

- 29. By filing this Notice of Removal, Verizon does not waive any defenses that may be available to it and reserves all such defenses. In addition, Verizon does not waive its right to compel arbitration of this dispute pursuant to the parties' contract, nor does Verizon concede that plaintiff states any claim upon which relief can be granted, or that plaintiff is entitled to any relief of any nature. Nonetheless, Plaintiff's claims, as pleaded in the Complaint at the time of removal, "whether well or ill founded in fact, fixes the right of the defendant to remove." *St. Paul Mercury Indem. Co. v. Red Cab Co.*, 202 U.S. 283, 294 (1938).
- 30. If any challenges to the propriety of the removal of this action arise, Verizon respectfully requests the opportunity to present oral argument.

WHEREFORE, Verizon hereby removes this Action to this Court from the Court of Common Pleas for the County of Philadelphia.

Brian T. Feeney GREENBERG TRAURIG, LLP 2700 Two Commerce Square

2001 Market Street Philadelphia, PA 19103

-and-

Philip R. Sellinger Eric D. Wong GREENBERG TRAURIG, LLP 500 Campus Drive, Suite 400 Florham Park, New Jersey 07932 (973) 360-7900 (973) 301-8410 (fax)

Attorneys for Defendants Verizon Pennsylvania, LLC and Verizon Online LLC (as successor to Verizon Online Pennsylvania Partnership)

Dated: October 31, 2016

## **CERTIFICATE OF SERVICE**

I, Bradly A. Nankerville, hereby certify that on this 31st day of October, 2016, I served a true and correct copy of the foregoing Notice of Removal on all counsel of record via UPS Overnight.

Bradly A. Napkerville

# EXHIBIT A



Court of Common Pleas of Philadelphia County Trial Division

For Prothonolary Use Only (Docket Number).
SEPTEMBER 2016

CIVII Co	ver Sneet	E-Filling Number: 1609064000
PLAINTIFPS NAME CHRISTOPHER KELLLY		DEFENDANTS NAME VERIZON PENNSYLVANIA, LLC C/O CT CORPORATION SYSTEM
PLAINTIFFS ADDRESS 620 GORGAS LANE PHILADELPHIA PA 19128.		DEFENDANTS ADDRESS 116 PINE STREET HARRISBURG PA 17101
PLAINTIFF'S NAME	#* ***********************************	DEPENDANTS NAME VERIZON ONLINE FENNSYLVANIA PARTNERSHIP
PLAINTIFPS ADDRESS		DEFENDANTS ADDRESS 1095 AVENUE OF THE AMERICAS NEW YORK NY 10036
PLAINTIFF'S NAME		DEFENDANTS NAME VERIZON PENNSYLVANIA C/O CT CORPORATION
PLAINTIFF'S ADDRESS	1	DEFENDANTS ADDRESS TWO COMMERCE SQUARE 2001 MARKET STREET, 5TH FLOOR PHILADELPHIA PA 19103
TOTAL NUMBER OF PLAINTIFFS	TOTAL NUMBER OF DEFENDANTS	COMMENCEMENT OF ACTION
1	3 *	☐ Complaint    ☐ Petition Action    ☐ Notice of Appeal     ☐ Writ of Summons    ☐ Transfer From Other Jurisdictions
AMOUNT IN CONTROVERSY COL	IRT PROGRAMS :	
	Arbitration	ass Tort Commerce Settlement vings Action Minor Court Appeal Minors
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	Other: CLASS ACTION	
CASE TYPE AND CODE  C1 - CLASS ACTION  STATUTORY BASIS FOR CAUSE OF ACTION	NC	
RELATED PENDING CASES (LIST BY CASI	¥	FILED IS CASE SUBJECT TO COORDINATION ORDER? YES NO
		M. BRYANT
TO THE PROTHONOTARY	:	¥
		cr/Appellant: CHRISTOPHER KELLY
Papers may be served at the a	i e	
NAME OF PLAINTIFF STPETITIONER'S/API	PELLANT'S ATTORNEY	ADDRESS
DAVID S. SENOFF		ANAPOL WEISS ONE LOGAN SQUARE
PHONE NUMBER (215) 735-1130	none entered	130 N. 18TH ST., SUITE 1600 PHILADELPHIA PA 19103
SUPREME COURT IDENTIFICATION NO.		E-MAIL ADDRESS
65278	(*) (*)	dsenoff@anapolweiss.com
SIGNATURE OF FILING ATTORNEY OR PA	NETY	DATE SUBMITTED
DAVID SENOFF		Wednesday, September 28, 2016, 05:10 pm

SOL H. WEISS, ESQUIRE (NO. 15925)
DAVID S. SENOFF, ESQUIRE (NO. 65278)
CLAYTON P. FLAHERTY, ESQUIRE (NO. 319767)
ANAPOL WEISS
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PHONE: (215) 790-4550
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dsenoff@anapolweiss.com

ATTORNEYS FOR THE PLAINTIFF
AND THE CLASS

Pilet and Attented by the office of United to Records
26-868 2018 05: 107 pm

Christopher Kelly, Individually and on Behalf of All Others Similarly Situated 620 Gorgas Lane Philadelphia, PA 19128

PLAINTIFF,

٧.

VERIZON PENNSYLVANIA, LLC C/O CT CORPORATION SYSTEM 116 PINE STREET, SUITE 320 HARRISBURG, PENNSYLVANIA 17101

AND

VERIZON ONLINE PENNSYLVANIA PARTNERSHIP 1095 AVENUE OF THE AMERICAS NEW YORK, NY 10036

VND

VERIZON PENNSYLVANIA C/O CT CORPORATION TWO COMMERCE SQUARE 2001 MARKET STREET 5<sup>TH</sup> FLOOR PHILADELPHIA, PA 19103

DEFENDANTS.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

SEPTEMBER TERM, 2016

FILE NO.

CIVILACTION - CLASS ACTION

JURY TRIAL DEMANDED

NOTICE TO DEFEND

Case ID: 160903521

#### NOTICE

You have been sured in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) thys after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are wanted that if you fall to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER. THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT, MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

PHILADELPHIA BAR ASSOCIATION
LAWYER REFERRAL AND INFORMATION SERVICE
One Reading Center
Philadelphia, Penasylvania 19107
Telcybona: 215-238-1701

#### AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificación. Hace fulta asentar una comparesencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus dufensos o sus objectoras a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tornara medidos y puede continuar la demanda en contra suya sin previo aviso o notificación. Ademas, la corte puede desidir a favor del demandante y requiere que usted campla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades a ostros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME FOR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

ASOCIACION DE LICENCIADOS DE FILADELFIA SERVICIO DE REFERENCIA E INFORMACION LEGAL Ono Reading Center Filadelfia, Pennsylvania 19107 Telefono: 215-238-1701

Case ID: 160903521

Sol H. Weiss, Esquire (No. 15925)
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ATTORNEYS FOR THE PLAINTIFF
AND THE CLASS

CHRISTOPHER KELLY, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED 620 GORGAS LANE PHILADELPHIA, PA 19128

SEPTEMBER TERM, 2016

PLAINTIFF,

FILE NO.

v.

CIVIL ACTION - CLASS ACTION

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

Verizon Pennsylvania, LLC c/o CT Corporation System 116 Pine Street, Suite 320 Harrisburg, Pennsylvania 17101 JURY TRIAL DEMANDED

AND

Verizon Online Pennsylvania Partnership 1095 Avenue of the Americas New York, NY 10036

AND

VERIZON PENNSYLVANIA C/O CT CORPORATION TWO COMMERCE SQUARE 2001 MARKET STREET 5TH FLOOR PHILADELPHIA, PA 19103

DEFENDANTS.

CLASS ACTION COMPLAINT

Case ID: 160903521

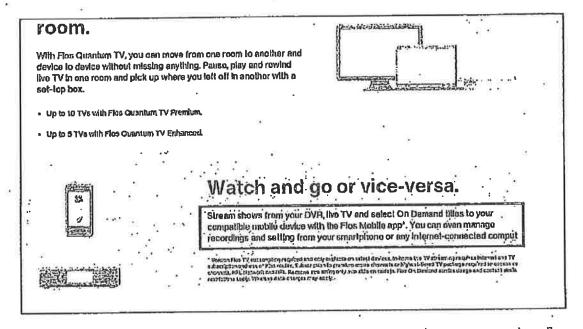
Plaintiff, Christopher Kelly, individually and on behalf of all others similarly situated, by and through his attorneys, Anapol Weiss, alleges as follows upon personal knowledge as to himself and his own acts and experiences, and as to all other matters, upon information and belief, including investigation conducted by his attorneys.

#### INTRODUCTION

- 1. Defendant Verizon Pennsylvania, LLC, is a limited liability corporation organized and existing under the laws of the State of Delaware, while Defendants Verizon Online Pennsylvania Partnership, and Verizon Pennsylvania (collectively, "Verizon"), are unincorporated business entities organized under the laws of Pennsylvania. Verizon is a leading provider of television programming—known commercially as "FiOS"—to customers across the country, including Pennsylvania. As of February 2016, FiOS is the largest provider of fiber optic broadband in the U.S., servicing some 31.6 million people. See, e.g., Verizon FiOS, BroadbandNow, available at <a href="http://www.broadbandnow.com/Verizon-Fios">http://www.broadbandnow.com/Verizon-Fios</a> (last visited Sept. 20, 2016). Pennsylvania is one of Verizon's largest coverage areas, with service available across 88 percent of the Commonwealth. See, e.g., Nick Reese, Pennsylvania's Broadband: Stats & Figures, BroadbandNow, (July 19, 2016), <a href="http://broadbandnow.com/Pennsylvania">http://broadbandnow.com/Pennsylvania</a>.
- 2. Verizon requires its FiOS customers to lease a "set-top" box for each television to be connected to Verizon's broadband network. Verizon's FiOS customers are assessed recurring fees for the use of these devices, which range in price from \$9.99 to \$12.00 per month (in addition to the cost of FiOS service).
- 3. These devices provide an "input" connection for a FiOS cable line and an "output" connection to a customer's television. Verizon requires its customers to utilize

a separate box for each and every television connected to the FiOS network. Allegedly, these devices are required to facilitate various functions, such as decoding broadband signals, accessing on-demand content ("ODC"), or utilizing "digital video recorder" ("DVR") functions.

4. In addition to basic FiOS service, Verizon also offers a "FiOS Quantum TV" ("Quantum"), a premium service with increased functionality. In particular, Quantum customers have access to the "FiOS Mobile App" ("the application") that allows Quantum customers to access FiOS service via properly equipped digital devices (i.e., "smart" televisions, "smart" cellular phones, tablets, and computers). The application permits Verizon's customers to access live-TV programming, ODC, and DVR functions via digital devices that are not connected to a Verizon set-top box. Rather, these devices access FiOS content by connecting directly to the Internet. See, e.g., FiOS Quantum TV, Verizon, <a href="http://www.verizon.com/home/MLP/OTV.html">http://www.verizon.com/home/MLP/OTV.html</a> (last visited Sept. 26, 2016) ("Stream shows from your DVR, live TV, and select On Demand titles to your compatible mobile device with the [FiOS] Mobile app. You can even manage recordings and setting from your smartphone or any internet-connected computer."):



- 5. In addition to permitting Quantum customers to view content, primarily, many of these mobile devices are also capable of "exporting" the application to secondary mediums. For example, computers are capable of "projecting" their desktop screen onto many (if not most) televisions through the use of standardized digital connectors. Other third-party devices discussed further, infra, also offer alternatives to the use of a set-top box. Therefore, customers utilizing the application or, more generally, the internet are capable of viewing FiOS content without the use of a device directly connected to a set-top box.
- 6. Notwithstanding the accessibility of the application and other "third-party equipment alternatives," Verizon deceives and confuses its Quantum customers by

The phrase "third-party equipment alternatives" is used throughout this complaint, broadly, to refer to the various set-top box substitutes available to Quantum customers. These workarounds include, but are not limited to: (1) through the use of a "digital media streaming device" that is directly connected to a television (e.g., the Roku Streaming Stick, the Amazon Fire TV Stick, the Google Chromecast); (2) through the use of an application that is streamed directly to properly equipped "smart" televisions (e.g., the application accessed directly from a "smart" television); and (3) through the use of an application that is streamed to a properly equipped digital device (such as a laptop computer utilizing the application or the

remaining silent regarding the availability of set-top box alternatives. Instead, Verizon deceptively claims that a set-top box connection is required to view content on all of its customers' television sets. Verizon's predatory claims regarding the alleged functionality of its set-top boxes are at-odds with technological reality and Verizon's legal duties to the Commonwealth's consumers.

- 7. In violation of the Pennsylvania Unfair Trade Practices and Consumer Protection Law ("UTPCPL"), 73 P.S. §§ 201-1, et seq., Verizon has deceived and confused its Quantum customers into leasing multiple set-top boxes in order to access FiOS on multiple televisions.<sup>2</sup>
- 8. Verizon's deceptive and confusing communications regarding the functionality of its set-top boxes, and the monthly fees that it has assessed Quantum customers, constitute illegal conduct under the laws of the Commonwealth.

#### JURISDICTION AND VENUE

- 9. Plaintiff has commenced this action pursuant to the "unlimited original jurisdiction" of the Pennsylvania Courts of Common Pleas. See, e.g., 42 Pa.C.S. § 931(a).
- 10. Verizon regularly and systematically conducts business within Pennsylvania and personal jurisdiction is, therefore, properly exercised over Defendant.
- 11. This Honorable Court is a proper venue pursuant to Pa.R.Civ.P. 1006.

  Verizon regularly and systematically conducts business in Philadelphia County, a

internet) that is then projected onto a television through the use of standardized digital connectors. See also, e.g., infra at \$\\$36-41\$.

<sup>&</sup>lt;sup>2</sup> Even assuming, arguendo, that technological aspects of FiOS functionality requires customers to maintain a single set-top box, Verizon's Quantum customers can access the full suite of FiOS content (including the ability to view that content on a television) without the use of multiple set-top boxes. Plaintiff does not concede that a single set-top box is, in fact, required to access FiOS content. However, to the extent that a single set-top box may be necessary to effectuate various FiOS functions, Plaintiff avers that requiring Quantum customers to lease a set-top box for each and every television to be connected to FiOS is technologically redundant and commercially deceptive.

substantial part of the events giving rise to Plaintiff's claims occurred in Philadelphia County.

#### THE PARTIES

- 12. Plaintiff, Christopher Kelly, is an adult who resides at 620 Gorgas Lane, Philadelphia, Pennsylvania.
- 13. Since at least August 2014, Plaintiff has been and currently is a Quantum customer of Verizon, and has been leasing two (2) set-top boxes from the Defendant.
- 14. Defendant, Verizon Pennsylvania, LLC, is a limited liability corporation organized and existing under the laws of the state of Delaware with its service address listed as c/o CT Corporation System, 116 Pine Street, Suite 320, Harrisburg, Pennsylvania 17101.
- 15. Defendant, Verizon Online Pennsylvania Partnership, is a partnership and unincorporated business entity organized and existing under the laws of Pennsylvania, with a registered address of: 1095 Avenue of the Americas, New York, NY 10036. The partnership has two owners of record: (1) Verizon North, Inc. (now known as "Frontier North, Inc."), a business corporation incorporated in Wisconsin whose registered address is: 3 High Ride Park, Stainford, CT 06905-1337; and (2) Verizon Pennsylvania, Inc., a business corporation incorporated in Pennsylvania, with a registered address of: c/o CT Corporation, Two Commerce Square, 2001 Market Street, 5th Floor, Philadelphia, PA 19103.
- 16. Defendant, Verizon Pennsylvania, is an unincorporated business entity organized and existing under the laws of Pennsylvania whose registered address is: 1717

  Arch Street, Philadelphia, PA 19103. The entity has one owner of record: Bell Atlantic

Pennsylvania, Inc., which is a previous corporate name of "Verizon Pennsylvania, Inc.," (previously described above as an owner of Verizon Online Pennsylvania Partnership) a business corporation incorporated in Pennsylvania, with a registered address of: c/o CT Corporation, Two Commerce Square, 2001 Market Street, 5th Floor, Philadelphia, PA 19103.

- 17. For the sake of brevity and clarity, these entities are referred to, collectively, as "Verizon" throughout this complaint.
- 18. Upon information and belief, at all times relevant hereto, Verizon was acting individually, jointly, and/or by and through its agents, servants, franchisees, workmen, and/or employees.
- 19. Upon information and belief, Verizon provides broadband cable services, including high-speed Internet service and fiber-to-the-premises services under the "FiOS" service mark for both residential and commercial customers.
- 20. Upon information and belief, Verizon provides services across the Commonwealth, including; but not limited to, Philadelphia County.
- Upon information and belief, at all relevant times hereto, throughout the instant class period, and continuing until today, Verizon has been the service provider for all of the aforementioned FiOS services in the Commonwealth, including, but not limited to, Quantum.
- 22. Upon information and belief, Verizon also acts as the lessor of the aforementioned "set-top" boxes. At all times relevant hereto, Verizon charges a monthly leasing fee in connection with these devices that ranges from \$9.99 to \$12.00. This recurring charge appears as an item that is identified as "TV Equipment Package" on

Plaintiff's documentation from Verizon. See, e.g., Plaintiff's August 2016 and September 2016 Verizon bills, including respective charges for renting two set-top boxes totaling \$19.98, true and correct copies of which are attached hereto, made a part hereof, and collectively marked Exhibit "A."

#### FACTUAL BACKGROUND

## Leasing of "Set-Top" Boxes to Verizon Customers

- 23. Verizon's parent company of the same name is one of the largest providers of television programming, to wit: multi-channel video programming distribution ("MVPD") in the United States. This content includes, but is not limited to, FiOS and Ouantum
- 24. In addition to paying for MVPD services, Verizon customers are also obligated to rent a separate proprietary product—the set-top box—for a leasing fee that is assessed in addition to the cost of the underlying service. Verizon effectuates these leases under the guise that a separate set top box is required for each television to be connected to the FiOS network.
- 25. Alternatively referred to as a "digital receiver" or a "digital converter," these units are designed with a single "input" and "output" connection. Verizon erroneously purports that such devices are a necessary conduit between a FiOS cable connection and a television. Specifically, Verizon deceives Quantum customers into leasing one (1) set-top box for each and every television to be connected to the FiOS network.
- 26. Upon information and belief, Plaintiff avers that Verizon trains and instructs its employees to claim that customers <u>must</u> lease a set-top box for each

television to be connected to the FiOS network. This exclusive leasing scheme is nothing more than a thinly veiled mechanism enabling Verizon to secure additional, supracompetitive profits.3

27. Verizon does not adequately apprise and therefore confuses its Quantum customers regarding the availability of third-party equipment alternatives. To the contrary, Verizon and its employees/agents have deceived its customers into believing that leasing multiple set-top boxes from Verizon is a prerequisite for accessing FiOS services on multiple televisions in their own homes.

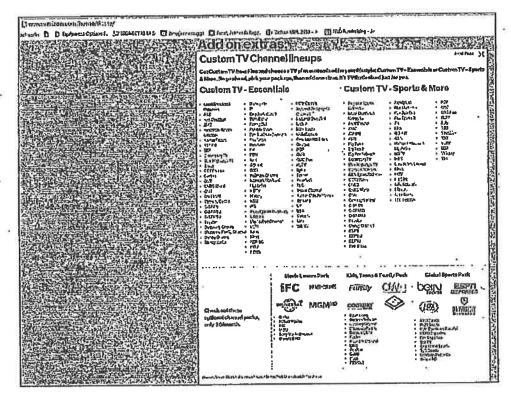
## Overview of Verizon's Sales Processes

- 28. Verizon offers a premium FiOS program titled "FiOS Quantum TV," which: (1) increases DVR storage capacity; (2) allows customers to pause / rewind live television; and (3) increases the number of channels available via DVR. See, e.g., Upgrade to Quantum TV, Verizon, <a href="http://fios.verizon.com/upgrade-to-quantum-tv.btml">http://fios.verizon.com/upgrade-to-quantum-tv.btml</a> (last visited Sept. 26, 2016).
- 29. Verizon offers two types of Quantum services: "Premium" and "Enhanced," with the Premium package offering doubled capabilities. These services range in price from \$22 to \$32 per month.
- 30. Customers are able to purchase FiOS services—including, but not limited to, Quantum—via the Verizon website. During this process, every service option available to potential customers requires them to lease a set-top box for each television set to be connected to the FiOS network.

s This policy is in stark contrast to other equipment policies associated with Verizon's FiOS services. For example, FiOS customers must utilize a router in order to obtain FiOS Internet service, which Verizon offers for both lease and purchase.

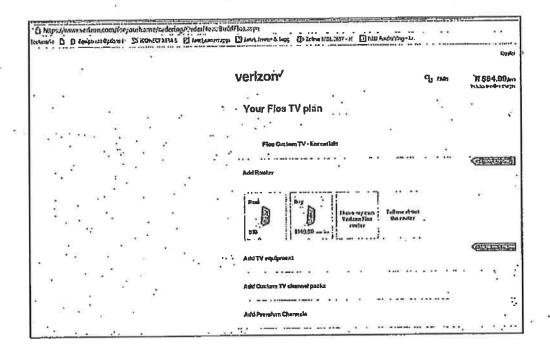
31. Below are several screenshots taken from a putative service order that was generated on the Verizon website, with the service address set within Philadelphia, Pennsylvania. Specifically, these screenshots represent a potential customer selecting a plan titled "Custom TV – Essentials," priced at a base of \$64.99 per month:

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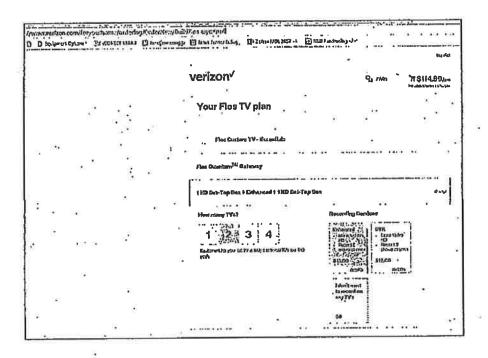


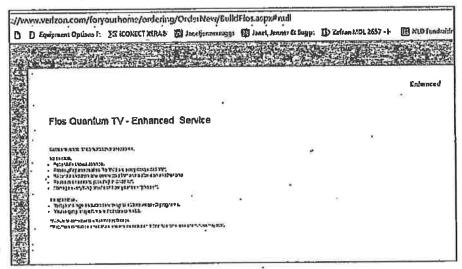
32. After selecting a FiOS plan, Verizon's online ordering process provides customers with the option of renting a "FiOS Quantum Gateway" router from FiOS for \$10.00 per month, or, alternatively, customers may purchase the same router for a one-time charge of \$149.99. This selection process is illustrated on the two screenshots below:

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- 33. After selecting a router, customers are directed to an interface requiring them to lease a set-top box for each television to be connected to the FiOS network. Specifically, this process requires Verizon's customers to: (1) state how many televisions they will be connecting to FiOS service; and (2) select DVR recording options (titled "Recording Services" below).
- 34. This interface forces Verizon customers to lease a set-top box for every television to be connected to the FiOS network. These leases are presented as automatic and imperative, without reference to the available third-party equipment alternatives:





35. Verizon's purchase process does not provide customers with an affirmative choice to: (1) select how many set-top boxes they wish to lease from Verizon; (2) purchase these set-top boxes in lieu of a leasing agreement; or (3) obtain analogous equipment from various third-party merchants during the initial ordering process. As

currently administered, leasing multiple set-top boxes is presented as an absolute condition of obtaining FiOS service from Verizon on multiple televisions.

36. The total monthly bill for a putative Verizon customer who selects this hypothetical service package for two (2) televisions, leases a router, and opts for "Enhanced" DVR coverage (including Quantum) will have a monthly bill estimated at \$129.40. Verizon currently charges \$12.00 per month for a customer's first set-top box, and \$10.00 per month for reach additional box. This means that the monthly fees for equipment rental (including the router) totals \$50.00, alone:

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37. If the same putative Verizon customer elected to connect four (4) televisions to the FiOS network, the monthly cost would rise to an estimated \$152.14 per month. The total fees for renting equipment (one router and four (4) set-top boxes)

would total at least \$70.00, accounting for nearly fifty percent of the customer's overall bill:

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	Estimated Monthly Charges	\$152,14			

## Quantum Provides Concomitant "Mobile" Access to the FiOS Network

- 38. Verizon's customers that opt for Quantum coverage are given access to the application and to Verizon's internet website, which allows customers to access live programming, ODC, and DVR functions from any properly equipped digital device (i.e., "smart" televisions, "smart" cell phones, tablets, and computers).
- 39. The application and the website are effective both within, and without, Verizon's customers' homes and permits access to the panoply of the FiOS services included in each respective customer's service plan. For example, Quantum customers

utilizing the application or the internet may watch live-streaming channels in real time, fully access DVR recordings and settings, and fully access ODC on multiple televisions without the use of an equal number of set-top boxes.

- 40. In particular, there are at least three substitutes to Verizon's set-top box "requirement": (1) through the use of a "digital media streaming device" that is directly connected to a television (e.g., the Roku Streaming Stick, the Amazon Fire TV Stick, the Google Chromecast); (2) through the use of an application that is streamed directly to properly equipped "smart" televisions (e.g., the application accessed directly from a "smart" television); and (3) through the use of an application or the internet that is streamed to a properly equipped digital device (such as a laptop computer utilizing the application) that is then "projected" onto a television through the use of standardized digital connectors.
- 41. "Digital media streaming devices" are marketed by various third-parties and typically range in cost from \$30.00 to \$50.00. These devices connect to televisions and enable the playing of audio-visual content by streaming content (i.e., through the application), from the Verizon customer's wireless Internet connection ("Wi-Fi").
- 42. Similarly, many "smart" televisions have integrated Internet features (such as the capability of directly connecting to Wi-Fi) and are capable of streaming such content via Wi-Fi without the use of a third-party device.
- 43. Additionally, mobile digital devices such as "smart" cellular phones, tablets, or most computers are also capable of accessing FiOS content without a set-top box via the application or an Internet browser. This content can then be "projected" to a Verizon customers' televisions with the use of various standardized digital connections

(the specific requirements vary depending on the make and model of the digital device and the television).

- 44. The conclusion suggested by these alternatives is unavoidable: Quantum customers are readily able to view and access FiOS content on multiple televisions without the use of multiple set-top boxes.
- 45. This revelation dovetails with research indicating that the use and availability of third-party equipment alternatives is expanding rapidly. According to estimates produced by the digital data analysts at eMarketer, 49.7 percent of the U.S. population will be using "connected televisions" to access the Internet, directly, by the end of 2016. See, e.g., Majority of US Internet Users to Use a Connected TV by 2015, EMARKETER (Jun. 13, 2014), available at <a href="http://www.emarketer.com/Article/Majority-of-US-Internet-Users-Use-Connected-TV-by-2015/1010908">http://www.emarketer.com/Article/Majority-of-US-Internet-Users-Use-Connected-TV-by-2015/1010908</a>. Additionally, surveys conducted by the Pew Research Center estimated that cell phone ownership among U.S. adults was at 68 percent in 2015. See, e.g., Monica Anderson, Technology Device Ownership: 2015, Pew Research Center, (Oct. 29, 2015), available at <a href="http://www.pewinternet.org/2015/10/29/technology-device-ownership-2015/">http://www.pewinternet.org/2015/10/29/technology-device-ownership-2015/</a>.
- 46. At no time throughout its sales process does Verizon inform its Quantum customers that it is possible to access FiOS service on a television that is not connected to a set-top box through the use of any of the aforementioned third-party equipment alternatives. Rather, Verizon's sales process confusingly and deceptively requires Quantum customers to lease multiple set-top boxes in order to access FiOS service on multiple televisions in the same household.

### Plaintiff's Purchase of Verizon FiOS Programming With Quantum Service

- 47. Plaintiff is sensitive to the price of digital cable programming and has, at various times, compared pricing options offered by competing digital cable providers.
- 48. In or about August 2014, Plaintiff purchased a "Triple Play Bundle" from Verizon which included Quantum as part of the overall plan.
- 49. At the time of purchase, Plaintiff chose to connect his FiOS service to two (2) televisions through the automatic leasing process utilized by Verizon. Since his service contract began in August 2014, Plaintiff consistently has been charged \$19.98 every month for the two set-top boxes. See, e.g., Plaintiff's Verizon bills from August 2014, September 2014, October 2014, December 2015, January 2016, and February 2016, including charges for two set-top boxes totaling \$19.98, true and correct copies of which are attached hereto, made a part hereof, and collectively marked Exhibit "B."
- 50. After approximately two years of service, Plaintiff has paid a total of \$479.52 in lease charges, alone, for the two set-top boxes.

#### Verizon's Deceptive and Misleading Sales Practices

- 51. Verizon is a Major MVPD service provider in the Commonwealth of ...
  Pennsylvania.
- 52. At all relevant times hereto and continuing until today, Verizon was required to peddle its FiOS services while providing full disclosures to its Quantum customers regarding the third-party equipment alternatives available (with particular reference to subscribers leasing more than one set-top box from Verizon).
- 53. Upon information and belief, Verizon's deceptive conduct took the form of Verizon's representations, primarily and by-and-through its employees and/or agents.

Customers wishing to purchase FiOS service were required to lease multiple set-top boxes in order to access FiOS programming on multiple televisions. In so doing, Verizon deceptively obfuscated the state of its technology, obscured the availability of third-party equipment alternatives, and collected lucrative fees at the expense of its clientele.

- 54. The ultimate result of this deceptive conduct is that Verizon's customers paid and continue to pay for the privilege of unneeded and redundant devices whose sole purpose is to generate an additional revenue stream for Verizon.
- 55. By engaging in the conduct set forth and described above, Verizon has violated Pennsylvania law in the following ways:
  - a. Deceptively and confusingly requiring Plaintiff and the Class to lease a separate set-top box for each television the customer wishes to connect to the FiOS network;
  - b. Improperly assessing monthly fees for multiple set-top boxes without disclosing to Quantum customers, including Plaintiff and the members of the class, that there are numerous third-party alternatives available that allow customers to access FiOS services on multiple televisions without the use of multiple set-top boxes;
  - c. Deceptively requiring its Quantum customers, including Plaintiff and the members of the class, to lease multiple set-top boxes by erroneously claiming that such equipment is required to view "all digital programming" on the multiple televisions;

- d. Deceptively and confusingly omitting facts which are material to the commercial relationship between Verizon and its Quantum customers, including Plaintiff and the other members of the class, to wit, the availability of third-party equipment alternatives, including:
  - Utilizing a "digital streaming device" that can connect to the Internet, primarily, and directly stream FiOS content through the application or by a similar means, without the use of Verizon's set-top box;
  - ii. Utilizing a "smart" television that can connect to the Internet, primarily, and directly stream FiOS content through the application or by a similar means, without the use of Verizon's set-top box; and
  - iii. Utilizing a "smart" digital device to stream FiOS content through the application or by a similar means, without the use of Verizon's set-top box, and then "projecting" that content onto a television through the use of standardized digital connectors.
- 56. Therefore, Plaintiff alleges that the deceptive conduct of Verizon and its abject failure to honestly market its Fios product gives rise to liability for the claims set forth herein.

#### CLASS ALLEGATIONS

- 57. Plaintiff brings this action on behalf of himself and as a member of the class defined below, as a class action under the provisions of Pa.R.C.P. 1711(a).
- 58. The class on whose behalf this action is brought by Plaintiff is defined as follows:

All Pennsylvania residents who are current or former customers of Defendant Verizon, who purchased FiOS with Quantum, and who have paid rental charges for the use of more than one so-called "set-top" box to Defendant Verizon at any time from September 2011 to the present.

- 59. Certification of the class defined above is proper in that:
- a. The proposed class of Pennsylvania citizens who purchased FiOS and Quantum from Verizon are so numerous that joinder of all members is impractical. The exact number and identities of this class are currently unknown to Plaintiff, however, the exact number and identities of the class members are known to Verizon; and
- b. There are questions of law and fact common to the class, including, but not limited, to whether Verizon:
  - Descrively required Quantum customers to lease set-top boxes for each television the customer wanted to connect to FiOS service;
  - ii. Deceptively obfuscated the availability of third-party equipment alternatives that would allow customers to fully access FiOS content on multiple televisions without the use of multiple set-top boxes; and
  - iii. Engaged in a duplicitous commercial scheme that constitutes an unfair method of competition and illegal, deceptive conduct under Pennsylvania law.
- 60. Plaintiff is a member of the class and his claims, as described above, are typical of the claims of the class members.

- 61. As the representative party, Plaintiff will fairly and adequately protect the interests of the class under the criteria set forth at Pa.R.C.P. 1709, in particular:
  - a. Plaintiff and his attorneys will adequately represent the interests of the class;
  - b. Plaintiff does not have any conflict of interest in the maintenance of this class action; and
  - c. Plaintiff has engaged responsible class counsel who have sufficient financial resources to assure that the interests of the class will be adequately protected and will not be harmed, consistent with the Pennsylvania Rules of Professional Conduct.
- 62. This class action provides a fair and efficient method for adjudication of the controversy under the criteria set forth at Pa.R.C.P. 1708, in particular:
  - a. Common questions of law and fact predominate over any questions affecting only individual members, including pleadings and factual issues relating to liability and damages;
  - b. The matter appropriately may be managed as a class action;
  - c. The prosecution of individual actions would create a risk of inconsistent adjudication, establishing disparate and incompatible standards of conduct for Verizon;
  - d. In view of the complexity and expense of litigation, the separate claims of the individual members of the class, alone, would not be sufficient to justify the expense of effectively prosecuting such claims;

- e. There is no pending litigation already commenced addressing these issues; and
- f. This court is the appropriate forum for litigation of the claims of the entire case.
- 63. The class is readily definable and prosecution of this controversy as a class action will eliminate the possibility of repetitious litigation, while also providing redress for claims that may be too small to support the expense of individual, complex litigation. In addition, the maintenance of separate actions would place a substantial and unnecessary burden on the courts of this Commonwealth and would result in inconsistent adjudications. Conversely, a single class action would definitively determine the rights of all class members with the added benefit of judicial economy.
- 64. In this action, Plaintiff seeks all appropriate and available relief from Verizon for its deceptive practices and unfair methods trade, specifically with regard to its deceptive conduct regarding the alleged "requirement" of leasing a "set-top box" for each and every television in a customer's home.

# COUNT I VIOLATIONS OF THE PENNSYLVANIA UNFAIR TRADE PRACTICES AND CONSUMER PROTECTION LAW

- 65. Plaintiff incorporates herein, by reference, all other paragraphs of this Class Action Complaint as if fully set forth herein at length.
- 66. This cause of action is brought pursuant to the UTPCPL, see, e.g., 73 P.S. §§ 201-1, et seq., which enshrines legal protections and recourse for Pennsylvania consumers against unfair or deceptive acts or practices in the conduct of any "trade or commerce," as defined at 73 P.S. §§ 201-2(4)(i)-(xxi); and 201-3.

- 67. Plaintiff and the class are "persons" as defined by the UTPCPL.
- 68. At all relevant times, Plaintiff and the class purchased goods and services from Verizon for personal, family, or household purposes as defined by the UTPCPL.
- 69. At all relevant times, the transactions between Plaintiff, the class, and Verizon constituted "trade or commerce" as defined by the UTPCPL.
- 70. Defendant Verizon's ongoing deceptive commercial practices, which required its customers to lease multiple set-top boxes as a pre-requisite for accessing FiOS content on multiple televisions, and its total obfuscation of the availability of numerous third-party equipment alternatives, violates Section 201-2(4)(xxi) of the UTPCPL in at least the following ways:
  - a. Deceptively and confusingly requiring Plaintiff and the Class to lease a separate set-top box for each television the customer wishes to connect to the FiOS network;
  - b. Improperly assessing monthly fees for multiple set-top boxes without disclosing to Quantum customers, including Plaintiff and the members of the class, that there are numerous third-party alternatives available that allow customers to access FiOS services on multiple televisions without the use of multiple set-top boxes;
  - c. Deceptively requiring its Quantum customers, including Plaintiff and the members of the class, to lease multiple set-top boxes by erroneously claiming that such equipment is required to view "all digital programming" on the multiple televisions;

- d. Deceptively and confusingly omitting facts which are material to the commercial relationship between Verizon and its Quantum customers, including Plaintiff and the other members of the class, to wit, the availability of third-party equipment alternatives, including:
  - Utilizing a "digital streaming device" that can connect to the Internet, primarily, and directly stream FiOS content through the application or by a similar means, without the use of Verizon's set-top box;
  - ii. Utilizing a "smart" television that can connect to the Internet, primarily, and directly stream FiOS content through the application or by a similar means, without the use of Verizon's set-top box; and
  - iii. Utilizing a "smart" digital device to stream FiOS content through
    the application or by a similar means, without the use of
    Verizon's set-top box, and then "projecting" that content onto a
    television through the use of standardized digital connectors.
- Although Plaintiff does not concede that reliance is not a necessary element of the UTPCPL violations set forth herein, to the extent that "justifiable detrimental reliance" may be a required element of the claims herein, Plaintiff and the class, at all relevant times hereto, justifiably relied upon Verizon's deceptive and unfair practices regarding the necessity of leasing multiple set-top boxes, to their detriment. Moreover, this justifiable detrimental reliance resulted in actual pecuniary harm to the Plaintiff and the class.

- 72. Plaintiff further avers that justifiable detrimental reliance is presumed as a result of the materiality of the transactions at issue in this case.
- 73. By reason of the foregoing, Plaintiff and the class have been harmed, entitling them to injunctive relief, actual damages, statutory damages, troble damages, costs of litigation, and reasonable attorneys' fees.

WHEREFORE, Plaintiff and the class respectfully request that this Honorable Court enter judgment against Verizon as to Count I and award Plaintiff and the class actual and statutory damages for each instance of unfair or deceptive conduct, including, but not limited to, each instance when Verizon obfuscated the availability of third-party equipment alternatives to Verizon's set-top boxes, and/or improperly required Plaintiff and the class to lease multiple set-top boxes. Plaintiff and the class respectfully request damages in an amount in excess of fifty-thousand dollars (\$50,000.00), together with interest, statutory damages, treble damages, costs of litigation, reasonable attorneys' fees, and such other relief as this Honorable Court may deem appropriate.

## COUNT II DECLARATORY JUDGMENT

- 74. Plaintiff and the class incorporate herein, by reference, all other paragraphs of this Class Action Complaint as if fully set forth herein at length.
- 75. The UTPCPL prohibits unfair methods of competition and deceptive acts and practices that create the likelihood of confusion or misunderstanding, including Verizon's actions, which deceptively required its Quantum customers to lease multiple set-top boxes in order to access FiOS content on multiple televisions. In reality,

Verizon has deceptively and confusingly obfuscated from its Quantum customers the availability of third-party equipment alternatives. See, e.g., 73 P.S. § 201-2(4)(xxi).

- 76. Verizon violated—and continues to violate—Pennsylvania law by deceptively requiring Plaintiff and the class to lease a set-top box from Verizon for every television to be connected to the FiOS broadband network. In reality, there are numerous legitimate alternatives that permit customers to fully access and enjoy FiOS on multiple televisions without an equal number of Verizon's devices.
- 77. Verizon's conduct, as described above, constitutes a continuing and ongoing violation of Pennsylvania law, as stated at Section 201-2(4)(xxi) of the UTPCPL, which necessitates judicial relief to remedy these improper practices.
- 78. Pursuant to 42 Pa.C.S. § 7533 ("Construction of documents"), this Honorable Court can adjudicate this controversy based upon the following language:

Any person interested under a deed, will, written contract, or other writings constituting a contract, or whose rights, status, or other legal relations are affected by a statute, municipal ordinance, contract, or franchise, may have determined any question of construction or validity arising under the instrument, statute, ordinance, contract, or franchise, and obtain a declaration of rights, status, or other legal relations thereunder.

79. Plaintiff and the class are interested, affected, and contemplated by the UTPCPL, as they are the persons who have purchased Verizon's goods or services through trade or commerce. See, e.g., 73 P.S. § 201-2. As a result, Plaintiff and the class are invested and affected by Verizon's flagrant violations of the UTPCPL. Moreover, Verizon's deceptive sales practices have created the significant likelihood of confusion and misunderstanding on the part of consumers in the Commonwealth.

- 80. Plaintiff and the class, therefore, seek a declaration that Verizon has violated—and continues to violate—Pennsylvania law, including, but not limited to, the UTPCPL by engaging in the following conduct:
  - a. Deceptively and confusingly requiring Plaintiff and the Class to lease a separate set-top box for each television the customer wishes to connect to the FiOS network;
  - b. Improperly assessing monthly fees for multiple set-top boxes without disclosing to Quantum customers, including Plaintiff and the members of the class, that there are numerous third-party alternatives available that allow customers to access FiOS services on multiple televisions without the use of multiple set-top boxes;
  - c. Deceptively requiring its Quantum customers, including Plaintiff and the members of the class, to lease multiple set-top boxes by erroneously claiming that such equipment is required to view "all digital programming" on the multiple televisions;
  - d. Deceptively and confusingly omitting facts which are material to the commercial relationship between Verizon and its Quantum customers, including Plaintiff and the other members of the class, to wit, the availability of third-party equipment alternatives, including:
    - Utilizing a "digital streaming device" that can connect to the Internet, primarily, and directly stream FiOS content through the application or by a similar means, without the use of Verizon's set-top box;

- ii. Utilizing a "smart" television that can connect to the Internet, primarily, and directly stream FiOS content through the application or by a similar means, without the use of Verizon's set-top box; and
- iii. Utilizing a "smart" digital device to stream FiOS content through the application or by a similar means, without the use of Verizon's set-top box, and then "projecting" that content onto a television through the use of standardized digital connectors.
- 81. Declaratory relief is appropriate because: (1) there is a real, actual, and substantial controversy in which claims have been asserted against Verizon, which has a vested interest in contesting those claims; (2) the instant controversy is between parties which are adverse and antagonistic; (3) Plaintiff and the class have a direct, substantial, and present interest in resolution of the instant controversy; and (4) the controversy is ripe for judicial determination and adjudication, and Plaintiff and the class seek a binding decree as the impropriety of Verizon's conduct.

WHEREFORE, Plaintiff and the class respectfully request that this Honorable Court enter judgment against Defendants on Count II and award the declaratory relief sought as well as any supplemental relief, including, but not limited to, injunctive relief, an accounting (pursuant to Pa. R. Civ. P. 1021), and any other appropriate relief under the circumstances to remedy Verizon's violations of the UTCPL, together with interest, costs of litigation, reasonable attorneys' fees, and any other relief that this Honorable Court may deem appropriate.

Respectfully submitted,

ANAPOL WEISS

Sol H. Weiss, Esquire (No. 15925) David S. Senoff, Esquire (No. 65278) Clayton P. Flaherty, Esquire (No. 319767)

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FAX: (215) 875-7733
dsenoff@anapolweiss.com

ATTORNEYS FOR PLAINITFF AND THE CLASS

DATE: September 28, 2016

## VERIFICATION

Christopher Kelly, Plaintiff in the within action, verifies that he is acquainted with the facts and information set forth in the foregoing Complaint, and that the same are true and correct to the best of his knowledge, information and belief. This Verification is made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsification to authorities.

CHRISTOPHER KELLY

Date: September 26, 2016

Exhibit "A"

CHRISTOPHER KELLY	Account Number	1: 454-026-986-0001-78
Account Summary	10	
Rievious Period		
Previous Balance	135.62	12:
Payment Received - Thank You	-135.62	8/7
Balance Forward	\$.00	
Current Charges (co. 1)		
Flos TV, Internet & Phone Bundle	89.99	8/19 ÷ 9/18
Additional Services & Equipment	24.97	8/19 - 9/18
Fees & Other Charges	20.66	
Total Due by September 12	\$135,62	

To avoid a late payment charge, pay the total due by Sep 20, 2016. For TV, internet and wheless services, the late payment charge is \$5 or 1.5% of your total due, whichever is greater. For all other services, the late payment charge is 1.25%.

## **Your Discounts**

	Price	Your Discounts	Amount You Pay	
Bundle Discounts: 4: 4-2-2-2		5 A 7 A 7	海军的基础	TV discount extended to 8/18/17, internet discount
Fios TV Preferred HD	54.99	-10.00	44.99	extended to 8/18/17.
Flos Internet 25/25	40,00	-25,00	15.00	:00
Flos Digital Voice Unlimited	30.00	Ti	30.00	S <b>₹</b>
Bundle Price	\$124,99	-\$35.00	\$89.99	
Additional Services & Equipment Di	scounts ?	46.50		
Flos Quantum TV - Enhanced Service	22.00	-22.00	.00	TV discount extended to 8/18/17.
Subtotal		-\$22.00		
Discounts This Month	(3 <del>1-31-31-</del>	-\$57.00	•//	3.00

Discounts have been applied to the Total Due shown under Account Summary.

## **Details of Current Charges**

Includes discounts shown under Your Discounts.

# Fios IV/Internetic/Phone Europe, # 17 - 5 1 44 17 19 19 19 19

Your bundle includes Flos TV Preferred HD, Flos Internet 25/25 and Flos Digital Voice Unilimited

Bundle Price \$89.99 8/19 - 9/18

Your monthly price after the discounts shown under Your Discounts were applied.

Additional Services & Equipment 2	
Equipment	
(Rent): 2 TV Equipment Package	19.98
(Rent): Wireless Router	4.99
Subtotal .	\$24.97 8/19 - 9/18

Equipment and additional services to personalize your Flos service.

Fees & Other Charges 4 1874		
Taxes, Governmental Fees & Surchar	ges	
PA State and Local Sales Tex	4.98	
Telecommunications Relay Service	.08	(90)
E911	1.65	
Verizon Surcharges & Fees .		
Federal Universal Service Fee	3.60	
PA Gross Receipts Tex Surcharge	1.81	• 0
Video Franchise Fee .	3.55	*
Regulatory Recovery Fee - Federal .	.08	
Franchise Related Costs	1.50	
Regional Sports Network Fee	2.42	J2477
FDV Administrative Charge	.99	J5162
Subtotal	\$20.66	
Total Due	\$135.62	5

includes both Verizon fees and governmental taxes and fees. For details, visit verizon.com/texesandrees.

Addillonal Tax Details 200							
Taxes, Foos and Other Charges	•	• •	•				
Volce *							
PA State Sales Tax	3		2.18				
PA Local Sales Tax			.72.				
Telecommunications Relay Service		12	.08	N.			
PA 911 Fee.	*		_1.65		040	1.	
Federal Universal Service Fee			3.60				9
PA Gross Receipts Tex Surcharge			1.81				
FDV Administrative Charge			.99				
TV		(1)	2				
PA State Sales Tax			1.26				
PA Local Sales Tax			.42				

	Total Taxes, Fees and Other Charges			\$20,66
	PA Local Sales Tax	-		.10
	PA State Sales Tax	~	ě:	.30
1	Internet			
	Regional Sports Network Fee			2.42
	Franchise Related Costs			1,50
	Regulatory Recovery Fee - Federal			.08
	Video Franchise Fee			<sup>-</sup> 1.05
	Video Franchise Fee			2.50

## ACCOUNT INFORMATION

### FREQUENTLY ASKED QUESTIONS

How can I make a payment arrangement?

Please visit us at vorizon.com/bilipay and select 'Payment Arrangement' under 'Payment Actions'.

Where do I find Flos Digital Voice options on my Flos TV?

From the Flos TV Main Menu, click on "Flos Digital Voice" and "OK"

View your call logs and listen to voice mail messages

Enable features like Caller ID on TV, Simultaneous Ring, Cell Forwarding, Incoming Call

Block, and Do Not Disturb

Refer to your user guide for details at verizon.com/flosvolce/userguide

What are the Taxes, Surcharges, and Fees on my bill?

Your bill includes federal, state and local texes, governmental surcharges and fees as wall as Verizon surcharges and fees. These charges vary depending on what products and services you have and in which state you use these products and services. For more information go to varizon,com/taxesandfees.

## IMPORTANT

It's Easy to Pay Your Verizon Bill with Your Fies TV Remote Control

You just need to be registered on MyVerizon.com and have a saved payment account.

Follow these easy steps:
Sot up a Parantal/Purchase Control PIN by pressing Menu, Settings, System and Parental/Purchase Control

Press Menu, Customer Support then My Account

Select Bill and Payment then View my Bill and enter your Parental Control Pln

Select OK from Account Summary, then OK again to Pay Your Bill

Select Payment Account, Your Payment Account, then press OK to submit

A confirmation of your payment will display once the transaction is complete.

Surcharges Include:

- a Federal Subscriber Line and Access Recovery Charge applicable to state-to-state and international services that helps pay for the costs of providing and maintaining the local phone network; a Federal Universal Service Charge applicable to state-to-state and international services to recover fees imposed on us by
- the government to support universal service;
- a Carrier Cost Recovery Chargo applicable to long distance customers that helps defray our costs for terminating calls on other networks, fees paid to support government programs such as Telecommunications Relay Service and local number portability, and other Federal Communications Commission-assessed charges;
- a Long Distance Administrative Charge applicable to long distance customers to help defray account servicing costs for state-to-state and international calling;
- a Federal Rogulatory Feo applicable to recover the annual per video subscriber fee payment made to the FCC; and,
- a FDV Administrative Charge applicable per Flos Digital Volce line to help defray account-servicing costs associated with providing voice services.

Please note that the surcharges are charges, not texes. These charges, and what is included in these charges, are subject to change from time to time. For additional information regarding the charges on your Varizon bill, please visit verizon.com or call the number listed on your bill.

## Customer Notices

Customer Proprietary Network Information (CPNI) Notice for Residential, Small and Medium Business Customers

CPNI is information that relates to the type, quantity, destination, technical configuration, location, amount of use, and billing information of your telecommunications or interconnected VoIP services. This information is made available to us solely by virtue of our relationship with you. The protection of your information is important to us. Under federal law, you have a right, and we have a duly, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services such as video, wireless, internet, and long distance. Visit varizon.com for a complete listing of our services and companies.

For residential, small and medium business customers, you may choose not to have your CPNI used for marketing purposes described above by calling us anytime at 1-866-483-9700. When you call, please have your bill and account number available. Your decision about use of your CPNI deesn't affect our provision of services to you nor eliminate all Verizon marketing contacts.

Unless you call us at the number above, Verlzon may use your CPNI to market different types of services beginning 30 days after the first time we notify you of the CPNI policy described above. You may elect at any time to add or ramove a restriction on the use of your CPNi. Your choice remains valid until you change your election by calling the number above.

Electronic Fund Transfer (EFT)

Paying by check authorizes us to process your check or use the check information for a one-time EFT from your bank account. Vertzon may retain this information to send you electronic refunds or enable your future electronic payments to us. If you do not want Vertzon to retain your bank information, call 1-888-500-5358.

Verizon PA provides regional, local calling and related features, other voice services, and Flos TV service, unless otherwise indicated. Verizon Long Distance provides long distance calling and other services identified by "VLD" in the applicable billed line llom. Verizon Online provides internet service and Flos TV equipment. Flos is a registered mark of Verizon Trademark

Local Franchise Authority - Fios TV City of Phija City Hall, 1400 JFK Blvd, Div of Tech, Cable TV Unit, Rm 702, Phila, PA 19107, 215 686-2934, Your FCC Community ID Is: PA3925

## Services

#### Questions

- Visit vertzon.com/support
- 1.800.Verlzon
- Customers with disabilities, call 1.800.974.6006 (voice or ity)

## More Ways to Pay

- Set up auto pay; verizon.com/autopay Pay in person: verizon.com/paymentiocations
- Pay by phone (fee applies): 1.800.837.4968

## Correspondence

Go to verizon.com/contactus or mail to PO Box 4846 Trenton, NJ 08650-4846.

## Closed Captioning Questions and Concerns?

If you have a concern or complaint with closed ceptioning on a program, please cell Verizon at 1.800.VERIZON. Written correspondence can be sent by fax to 1.888.806.7026, by omall to videoclosedcaption@verizon.com, or by mail to Verizon. PO Box 4849, Trenton, NJ 08650 Attn: Etaine Bucci, Sr. Mgr.

If you are or were in bankruptcy, this bill may include amounts for pre-bankruptcy service. You should not pay pre-bankruptcy amounts; they are for your information only. Mail bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.

## OFFERS & BENEFITS

## New movies

Ront or buy new releases instantly. Access them On Demand on Fios TV & on-the-go on the Fios Mobile app.

215-849-2730 Primary Phone: Account Number: 454-026-986-0001-78

Bill Date: September 18, 2016

## 🖲 Ways to Pay

- · Via the My Flos app
- · Online at vertzon.com/PayOnline

## Account Summary

10	neviron Celiford and a series of the series		<b>*********</b>
	Previous Balance Payment Received - Thank You	135.62 -135.62	9/6
	Balance Forward	\$.00	23
10			
1777	Flos Internet, TV & Phone Bundle	79.99	9/19 - 10/18
•	Additional Services & Equipment	44.99	9/19 - 10/18
	Requested Change in Service	-,82	*:
	Fees & Other Charges	19.65	
٦	Total Due by October 13	\$143.81	

To avoid a late payment charge, paythe total due by Oct 21, 2016. For TV, Internet and wireless services, the late payment charge is \$5 or 1.5% of your total due, whichever is greater. For all other services, the late payment charge is 1.25%.

## What changed?

- Discounts were added to your account this month, See Your Discounts on page
- Your recent changes are detailed on page 3 in Requested Change in Service.



## 🎲 Offers & benefits

## Entertainment offer

New this month - The Revenant on HBO®; Star Wars: The Force Awakenson Starz®& A Season With Florida State Football on Showtime®. Get one for \$15/mo, two for \$25/mo or all 3 for \$30/mo. Order on channel 860. Availability varies and restrictions apply.

## Entertainment offer

There is always something great on TV with SHOWTME®. Add SHOWTIME for only \$10/mo. Enjoy hit series like Masters of Sex and A Season With Florida Stato Football. Tune to channel 860 to order. Availability varies and restrictions apply.

## Send this stub with your payment

Account Number: 454-026-9	86-0001-78
Total Due: \$143.81	418160
Make check payablo to Verizon	
\$	

CHRISTOPHER KELLY 620 GURGAS LN PHILA PA 19128- 2448 <u>հահետանահվահահիսիսինո</u>րիսիուհինեսիին

VERIZON PO BOX 15124 ALBANY NY 12212-5124 հումնոհվական հումական հումների հումների հումների հումների հումնական հումների հումների հումների հումների հումնե

Primary Phone: 215-849-2730 . Account Number: 454-026-986-0001-78

Bill Date: September 18, 2016

## New movies

Rent or buy now releases instantly. Access them On Demand on Flos TV & on-the-go on the Flos Mobile app.

\$35 Internet discount includes \$20 discount expiring 9/10/18 and \$15 discount expiring 9/10/19. TV discount expires

## **Your Discounts**

s #940	Price	Discounts	YouPay
Englisherology 25	107-120-0	多数特别的	
Flos Internet 50/50	50.00	-35.00	15.00
Flos TV Preforred HD	64.99 <sup>.</sup>	-30.00	34.99
Flos Digital Voice Unlimited	30.00		30.00
Bundle Price	\$144.99	-\$65.00	\$79.99
Althornist which to to the	onophraints:		
(Rent): HD Set-Top Box	12.00	-2.00	10.00
Subtotal		-\$2,00	
Chemine disambalish		ISS MEAN	
Flos Setup .	80.00	-80,00	00,
Subtotal		-\$80.00	

TV Discount

9/10/19.

Fee Welved

Discounts This Month

Discounts have been applied to the Total Due shown on page 1.

# Fios Fast Facts Flos On Demand

With thousands of Video On Demand titles, you can watch the movies and shows you want, whenever you want. Many are free, Press the On Demand button on your remote to browse available titles.



## Speed Optlmizer

For fast WI-FI speeds, Flos Internet provides the Flos Speed Optimizer tool. The more gadgets you have, the more speed younged, so maximize your entertainment with Flos at verizon.com/speedoptimizer.

## Exchined the reservoir

## What is a "Requested Change in Service"?

This is the amount of charges or credits as a result of adding, removing or changing your services prior to your bill date. Monthly charges for the first full 30 day period are shown separately.

Why is my bill amount different than the amount I was quoted? Your bill amount may vary from the amount you were quoted due to a Requested Change in Service, Taxes, Fees and Surcharges and One-Time Charges. Where do I find the discounts I was promised at Installation?

You can see your discounts on page 2 of the bill under the section Your Discounts'. You can also visit verizon com/bilwew.

215-849-2730 Primary Phone:

Account Number: 454-026-986-0001-78

Bill Date: September 18, 2016

(S) Ways to Pay

- Via the My Flos app
- · Online at vertzon.com/PayOnline

## Details of Charges

Includes discounts shown on page 2.

Digethtomet BVR/Phone Dancie Your bundle Includes Flos Internet 50/50, Flos TV Preferred HD and Flos Digital Voice Unfimited

Bundle Price - 30 days

\$79.99 9/19 - 10/18

Your monthly price after the discounts shown on page 2 were applied.

Andrio also de la computação de la compu

Equipment

(Rent): Wireless Router Flos Equipment Package

Flos Quantum TV Enhanced Service \$18, (Rent): 1HD Set-Top Box \$12

10.00 (Rent): HD Set-Top Box

Subtotal - 30 days \$44.99

9/19 - 10/18

4,99 30.00 Equipment and additional services to personalize your Flos service.

Partial month charge or refund for services

added or removed prior to the bill date.

Problem of the conference of t Cancelled Services

Bundle Price (89.99 per month) romoved 9/9

-30.00 9/9 - 9/18

(Internet -\$5, TV \$15, Phono -\$10) (Rent): Wireless Router removed 9/9 (4,99 per month for 10 day refund)

9/9-9/18 -1.66

(Rent): 2 TV Equipment Package removed 9/9

9/9 - 9/18 (19.98 per month for 10 day refund) -6.66

Added Services

Bundle Price (79.99 per month) added

9/10

(Internet \$4,50, TV \$10.50, Phone \$9) 9/10 - 9/18 24.00

-\$.82

(Rent): Wireless Router added 9/10 (4.99 per month for 9 days)

1.50 9/10 - 9/18

(Rent): 1HD Set-Top Box added 9/10 (12.00 per month for 9 days)

9/10 - 9/18 3.60

Flos Quantum TV Enhanced Service

added 9/10 9/10 - 9/18 (18.00 per month for 9 days) 5.40

(Rent): HD Set-Top Box added 9/10 (10.00 per month for 9 days) 3.00 9/10 - 9/18

Subtotal

Includes both Verizon fees and governmental taxes and fees. For details, visit verizon.com/taxesandfees.

Index Olling Index 45% 1882	學是一個			
Taxes, Governmental Fees & Surcha	rges			
PA State and Local Sales Tex	7.01			
E911	. 1.65			
Telecommunications Relay Service	.08		•	
Verizon Surcharges & Fee's				296
Federal Universal Service Fee	3.48			
PA Gross Receipts Tax Surcharge	1.75	(8)		
Video Franchise Fee	3,95	3.9		
Frenchise Related Costs	1.50			
Regulatory Recovery Fee - Federal	.08			

## 

CHRISTOPHERKELLY
Primary Phone: 215-849-2730
Account Number: 454-026-986-0001-78
Bill Date: September 18, 2016

| Press Ober Charles continued to the Second Sports Network Fee -81

FDV Administrative Charge 96
Subtotal \$19.65

Total Due \$143.81

CHRISTOPHER KELLY
Primary Phone: 215-849-2730
Account Number: 454-028-986-0001-78
Bill Dato: September 18, 2016

(S) Ways to Pay

- Via the My Flos app
- Online at verizon.com/PayOnline



It's Easy to Pay Your Verizon Bill with Your Flos TV Remote Control

You just need to be registered on MyVerizon.com and have a saved payment account.

Follow these easy steps:

- Set up a Parental/Purchase Control PIN by pressing Menu, Settings, System and Perental/Purchase Control
- Press Menu, Customer Support then My Account
- Select Bill and Payment then View my Bill and enter your Parantal Control Pin
- Select OK from Account Summery, then OK again to Pay Your Bill
- Scient Payment Account, Your Payment Account, then press OK to submit

A confirmation of your payment will display once the transaction is complete.

## **Customer Notices**

Customer Proprietary Network Information (CPNI) Notice for Residential, Small and Medium Business Customers

CPNI is information that relates to the type, quantity, destination, technical contiguration, location, amount of use, and billing information of your telecommunications or interconnected VoIP services. This information is made available to us solely by virtue of our relationship with you. The protection of your information is important to us. Under federal law, you have a right, and we have a duty, to protect the confidentiality of your CPNI.

Warney use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services such as video, wireless, internet, and long distance. Visit verizon.com for a complete listing of our services and companies.

For residential, small and medium business customers, you may choose not to have your CPNI used for marketing purposes described above by calling us anytime at 1,856,483,9700. When you call, please have your bill and account number available, Your decision about use of your CPNI doesn't affect our provision of services to you nor eliminate all Verizon marketing contacts.

Unless you call us at the number above, Verizon may use your CPNI to market different types of services beginning 30 days after the first time we notify you of the CPNI policy described above. You may elect at any time to add or remove a restriction on the use of your CPNI. Your choice remains valid until you change your election by calling the number above.

## Electronic Fund Transfer (EFT)

Paying by check authorizes us to process your check or use the check information for a one-time EFT from your bank account. Verizon may retain this information to send you electronic refunds or enable your future electronic payments to us. If you do not want Verizon to retain your bank information, call 1.888.500.5358.

## Service Providers

Verizon PA provides regional, local calling and related features, other voico servicos, and Flos TV servico, unless otherwise indicated. Verizon Long Olstance provides long distance calling and other services identified by "VLD" in the applicable

bilited line item. Verizon Online provides internet service and Flos TV equipment. Flos is a registered mark of Verizon Trademark Services LLC.

Local Franchiso Authority - Fios TV City of Phila City Hall, 1400 JFK Blvd, Div of Tech, Cable TV Unit, Rm 702, Phila, PA 19107, 215 686-2934, Your FCC Community ID Is: PA3925

## Services

### Questions

- Visit verlzon.com/support
- 1,800.Verizen
- Customers with disabilities, call 1.800,974,6006 (volce or tty)

## More Ways to Pay

- Set up auto pay: vertzon.com/autopay
- Payin person: vertzon.com/paymentiocations
- Pay by phone (foo applies): 1.800.837.4966

Closed Captioning Questions and Concerns? If you have a concern or complaint with closed captioning an a program, please call Verizon at 1.800.VERIZON. Written correspondence can be sent by fax to 1.888.806.7026, by amail to videoclosed caption@verizon.com, or by mail to Verizon, PO Box 4849, Trenton, NJ 08650 Attn: Etaine Bucci, Sr. Mgr.

## Bankruptcy information

If you are or were in bankruptcy, this bill may include amounts for pro-bankruptcy service. You should not pay pre-bankruptcy amounts; they are for your information only. Mail bankruptcy-related correspondence to 500 Tachnology Drive, Suite 550, Waldon Spring, MO 63304.

Exhibit "B"

Account Number 454-026-988-0001-78 Amount Due .\$175.38



Enjoy Your Triple Play!

We are happy to have you as a ROS Triple Play customer and appreciate your business.

New Promotions
This month your discounts will begin on the following thans:

Triple Exclusive 24 Mo. Credit Bundle 24 Mo. Credit FIOS TV Record & Store Service Credit FIOS Internet Installation Credit

Get More, Save More

Call 1- 888-319-7268 to ensure you're getting the bast Vertzon services at a great value- from Phane, international phane and fun add- one. Together we'll find ways to save you oven more.

Current Activity				\$175.63
New Charges		[[2]]	8	
Balance Forward				\$.00
No Payment Received				8.00
Pravious Balance				\$.00
Account Summary	54			
Phone: 215-849-2730	27			
Statement Oale: 8/18/14 CHRISTOPHER KELLY				96
Account Information				

**Total Amount Due** 

Specials and Promotions

Taxes, Governmental Surcharges and Fees

Vertzon Surcharges and Other Charges & Credits

Total New Charges Due by September 12, 2014

\$175,38 \$175.38

\$22.00

\$6.69

\$15.06

Questions about your bill or service?
View your bills in detail at vertzon.com or call 1-800-VERIZOM (1-600-837-4965).
When asked for your account number, picose enter 454-028-986-0001-78.
Customars with disabilities call 1-800-974-6008 TTY.

Please	rotum	remil	slip	with	payme	nŁ
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00001806 01 AT 0.403 KB081811 0006 XX Christopher Kelly 221 W DUVAL ST Phila PA 19144-2507

դի<u>նիսիդոնիիուն</u>ինիկիկությիւնիիունի

եքիրվերներկնիինինակիրերկությաններկիիա

VERIZON PO BOX 920041 DALLAS TX 75392-0041

V5 454026986000178 00000000000 000000175380

	Phone Number 215- 849- 2730	Account No 454- 026- 1	umber 986- 0001- 78	Pago 2 of 4
	e inc	El sen		5
Current	Activity		B/15 FIOS Internat Activation Fee @ 69.99 Payment 1	22.22
Monthly I			013	23.33
	Tripte Play Bundie includes:		Parilel Month Charges Subiolal	\$38.67
W,0 W1	• FIOS Digital Voice Unlimited 30.00		Current Activity Total	\$175.63
	• Flos TV Preferred HD 54,99	356		• • • •
	• FIOS Internet 25/25 40.00		Specials and Promotions	
	Triple Exclusive 24 Mo. Credit		8/19 9/18 HOS TV Record & Store Service Credit thru	
	thru Avg 14, 2016 - 10.00		Aug 14, 2016	- 22.00
	(\$10.00 of TV)		· (\$22.00 off TV)	
	Bundle 24 Mp. Credit		8/15 FIGS Internet installation Charge @ 78.99 Feo	
	thru Aug 14, 2016 - 25.00 (\$25.00 olf Internel)		Malved .	.00
	Tripto Play Bundie Price	89.88	(\$79.99 off Internet)	
8/19 9/1		19.98	Specials and Promotions Total	- \$22.00
	FIOS Quantum TV - Enhanced Service	22.00	- ·	722.70
	(Rent): V/reless Router	4.99	Taxes, Governmental Surcharges and Fees	
	harges Subtotal	\$138.93	PA State and Locat Sales Tax	5.61
missen) (	inian agratus	4110101	Telecommunications Refay Service	.08
Partial M	nth Charges		E911	1,00
8/15 8/1	FIOS Digital Voice Unlimited (added)	4.00	Tolal Texes, Governmental Surcharges and	1.00
8/15 B/t	FIOS TV Preferred HD (added)	7.34	Fees	\$6.69
8/15 8/1	l (Reni): 2 TV Equipment Package (added)	2.66	rees	Quido
8/15 8/1	FIOS Quantum TV - Enhanced Service (added) 🔭	2.93	Having Corchages and Other Charges 2 Cres	llta .
8/15 8/1	3 Triplo Exclusive 24 Mo. Cradil (added)	- 1.33	Verizon Surcharges and Other Charges & Cred	
	(\$1.33 clf TV)		Fedoral Universal Service Feo	3,58 2,02
B/15 8/1	FIOS TV Record & Store Service Credit (added)	- 2,93	PA Gross Receipts Tax Surcharge	
	(\$2.93 off TV)		Video Franchise Fee	4.02
8/15 8/1	FIOS Internet 25/26 (added)	6.33	Regulatory Recovery Fee - Federal	.08
	(Rent): Wireless Reuter (added)	.87	Franchise Rolated Costs	1.50
	Bundle 24 Mo. Credit (edded)	- 3.33	Regional Sports Network Fee	2.74
117	(\$3.33 off Internet)	11.51	FOV Administrativo Chargo	1.12
(*)	*** (4		Total Verizon Surcharges and Olher Charges & Credits	\$15.06

## Legal Hotless

Payment by Check

Paying by check authorizes check processing or use of the check intermation for a one-time electronic fund bransfor from your account. For all payments using bank account information, we may rotate the information to send you electronic returns or onsole your future electronic payments to us (to opt out, call 1-888-500-5258).

Late Payment Chargus
To avoid a fatu payment charge of 1.5% or \$5.00, whichever is greater, on unput
balances ever \$20 payment must be received before \$50, 2014.

## Correspondenco

Go to verban.com/contactus or mell to PO Box 33078, St. Petersburg, FL 33733

## Clescil Captioning Questions and Concerns?

Create deptening distance and only certify?

If you have a concern or complaint with closed captioning on a program, please call Vertion of 1 - 660 - VHIVINI; Whiten correspondence can be sent by fix to 1 - 868 - 666 - 7026, by email to videoclosed caption@vertion.com, or by mail to Vertice, PO Box 33052, St. Petersburg, Ft. 33701 Alth: Cynthia Morales, Manager.

## Survico Providers

survice Previoles regional, local colling and related teatures, ether volco services, vont PLOS TV services, unless otherwise Indicated. Vertion Long Oktanico privides tang distance colling and other cervices identified by "VLO" in the applicable billed line Rem. Vertion Colling provides Internal service, HAIC services and PLOS TV equipment. FLOS is a registered mark of Vertican Trademark Services LLC.

Bankruptey Information
If you pre or vero in bankruptey, this statement may include amounts for
pre-bankruptey service. You should not pay pro-bankruptey amounts; they ere for
your information only. Also bankruptey-related correspondence to 500 Technology
Orivo, Suito 550, Woldon Spring, NIO 63304.

Local Franchiso Authority - FIOS TV City of Philo City Hall, 1400 JFK Gird, Div of Yech, Cable TV Unit, Rin 702, Philo, PA 19167, 215 565-2834, Year FCC Community ID bx PA3925

## 

Phone Number Account Number 215- 849- 2730 454- 026- 986- 0001- 78

Total New Charges \$175.38

Case 1D: 160903521

Page 3 of 4 Phone Number 215- 649- 2730 Account Number 454-028-986-0801-78

Page 4 of 4

## Need- to- Know Information

Customer Proprietary Network Information (CPNI) Notice CPNI is information that relates to the type, quantity, destination, technizal configuration, location, amount of use, and billing information of your felecommunications or information to VolP services. This information is made available to us solely by virtue of our relationship with you. The protection of your information is important to us. Under federal law, you have a right, and we have a duty, to protect the confidentiality of your CPNI.

We may use and share your CPM among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Verizon offers a full range of services such as video, whreless, internat, and long distance. Visit verizon.com for a complete listing of our services and companies.

You may choose not to have your CPNI used for the marketing "
purposes described above by calling us anytime at
1-868-483-9700. When you call, pleaso have your bill and account
number available. Your decision about use of your CPNI doesn't affect
our provision of services to you nor eliminate all Verizon marketing

Unless you call us at the number above, Verizon may use your CPNI to market different types of services beginning 30 days after the first time we notify you of the CPNI policy described above. You may elect at any time to add or remove a restriction on the use of your CPNI. Your choice remains valid until you change your election by calling the number above.

## We Value You

Thank you for being a toyal Vertzon customent We sincerely appreciate your business and look forward to continually providing you with the very best in entertainment. Call us at 1 - 888- 957- 8111 to learn about new ways you can enjoy your services and save with Vertzen.

# FIOS TV Programming Change in Allegheny, Chester and Washington Countles

This programming change applies only to customers in Allegheny, Chester and Viestington Counties. On or after July 1, 2014, the centent provider changed programming on Channel 469, from "WPGH Zuus Country" to "WPGH gotty", which features classic and award winning films.

## New Bill Payment Locations : ...

You may now visit any participaling Verizon Wireless location to pay your FIOS/Home Phone bill utilizing the stores' bill payment block. The klosks accept cash, check, or credit card. To find a payment location near you, visit verizon.com/paymentlocations. Verizon Wireless locations do not currently handle FIOS equipment returns.

## FIOS TV Channel Repositioning

On or after October 1, 2014, "TVBs" will move from channel 1798 to channel 1794 in the FIOS TV Channel Lineup.

## FIGS TV Programming Change in Pittsburgh

This programming change applies only to customers in the Pittsburgh area. On or after October 15, 2014, Channel 239 (50), "Hallmark Movie Channel" will no longer be available to customers with the Extreme HD, Essentials and Promier packages.

Account Number 454- 026- 986- 0001- 78 Amount Due \$157.80



Harila Billinia yoʻlgon Navysipil il Hillinidi.

## Got Moro, Save More

Cell 1 - 888-852-8111 to ensure you're gelling the best Verken services at a great value-from Phone, intercet and TV to money-seving bundles, international plans and fun add-ons. Together we'll find vrays to save you even more.

## MOVING?

Call Verzon before you move to set up your Internet, TV and phone for your new home. Plue, ask about our great new manay- saving bundles. Don't walt. Call should to 1-868-898-6837, and be sure to ask if PLOS is available in your areat Service availability varies. Account Information Statement Date: 9/18/14 CHRISTOPHER KELLY Phone: 215-849-2730

## **Account Summary**

Previous Balance		\$175.38
Payment Sep 1		- \$175.38
Balance Forward	0	\$,00

#### New Charge

New curifier	
Current Activity	\$160.29
Specials and Promotions	- \$22,00
Texas, Governmental Surcharges and Fees	\$6.03
Verlzon Surchargos and Other Charges & Credits	\$13.48
Total New Charges Due by October 13, 2014	\$157.80

**Total Amount Due** 

\$157.80

Questions about your bill or service?

View your bills in detail at vertzoa.com or call 1-800-VERIZON (1-800-837-4966). When asked for your account number, please enter 454-028-898-0001-78. Customers with disabilities call 1-800-974-8008 TTY.

Pleaso return remit allo with payment,

Account Number:

454- Q2G- 988- Q001- 78

Amount Due: \$157.80

091814

Make check payable to Vertzen

\$ DDD D

CHRISTOPHER KELLY 221 W DUVAL ST PHILA PA 19144-2507

VERIZON PO 80X 920041 DALLAS TX 75392-0041 **Account Number** 

454-026-986-0001-78

	lais and Promotions Total		-\$22.00
	Aug 14, 2018 (\$22.00 off TV)		- 22.00
B) 19	10/18 FIOS TV Record & Store Service Credit ti	)NJ	
Spe	cials and Promotions		
Curr	ent Activity Tolol		\$160.29
	ge in Sorvice Subtetel		\$23.33
	of 3	<b>.</b>	23,33
6/15	ge m Sorvico FIOS Internet Activation Foo @ 69.99 Pa	ymeni 2	
	ge in Sorvico		
	hly Charges Subtotal		\$136.88
	10/18 (Rent): Wireless Router		4.99
	10/16 FIOS Quantum TV - Enhanced Service		22.00
0/10	10/18 (Rent); 2 TV Equipment Peckage		19.98
	thru Aug 14, 2018 (\$25.00 off (nternal) Trinta Piav Bundio Prica	- 25.00	89.89
	Bundte 24 Mo. Credit		
	thru Aug 14, 2018 (\$10.00 off TV)	- 10.00	
	<ul> <li>Tripio Exolusive 24 Mo. Credit</li> </ul>		
	• FIOS Internat 26/25	40.00	**
	<ul> <li>FIOS Digital Voice Unlimited</li> <li>FIOS TV Preferred HD</li> </ul>	54.99	•
<b>9/19</b>	10/18 Triple Play Bundle includes:	30.CU -	
	hly Charges		*
	ent Activity		
de find it	ent Activity		

Phone Number

215-849-2730

Taxes,	Governmental Su	rcharges and Fee	S
	PA State and Local	Sales Tax	4,95
	Telecommunication	ns Relay Service	.00.
-00	E911		1.00
Total Ta	xes, Governmental	Surcharges and	
Fees			\$6.03
Verizon	Surcharges and	Other Charges &	Credits
	Federal Universal S	Service Fee	3,16
	PA Gross Receipts	Tax Surcharge	1,78
	Video Franchisə Fe	9	. 3,55
	Regulatory Recove	ry Fee - Federal	.08
	Franchise Related	Costs	1,50
	Regional Sports Ne	twork Fea	2.42
	FDV Administrative	Chargo	.89
Total Ve	rizon Surcharges a	nd Olher Charges 8	
Credits		-	\$13.48
Total N	ew Charges		\$157.80

**Page** 

2 of 3

## Legal Notices

## Payment by Check

Payment by check eviluatives check processing or use of the check information for a one-dime electronic fund transfer from your account. For all payments using bank account information, we may retain the information to early you electronic refunds or enable your fixing electronic payments to up (to opt out, call 1 - 868 - 500 - 5368).

Late Payment Charges
To evold a falls payment charge of 1.5% or \$5.00, whichever is greater, on unpaid
balances over \$20 payment must be exceived before Oct 21, 2014.

## Correspondence

Go to verteen, cons/contectus or mail to PO Box 33078, St. Petersburg, Pt. 33733

## Closed Captioning Questions and Concerns?

If you have a centern or complaint with closed ceptioning on a program, please cell Vertran at 1-800-VERIZON. Written correspondence can be sent by fax to 1-888-806-7026, by cmail to videoclosedcaption@vertran.com, or by mail to Vertran, PO Box 33052, St. Petersburg, FL 33701 Attn: Cynth'a Marsles, Manager.

## Service Providors

Service Provision
Ventrum PA provides regional, local calling and related features, other voice services, and FIOS TV content, unless other vote indicated. Ventrum Long Obstance provides long distance calling and other services identified by "VLO" in the applicable bited line large. Verlage Colona provides internet corride, KNIC service and FIOS TV equipment. FIOS is a registered mark of Ventrum Trademark Services LLC.

## Bankruptoy Information

Paningpoy information

If you ere or vere in bankniptcy, this statement may include emmants for
pre-bankniptcy scribe. You should not pay pre-bankniptcy amounts; they are for
your information only. Atail bankniptcy-related correspondence to 500 Technology
Orine, Suite 550, Weldon Spring, MO 63304.

Local Franchise Authority - FIGS TV City of Phila City Hall, 1400 JFK Bird, Div of Yech, Cable TV Unit, Rm 702, Phila, PA 19107, 215 686-2834, Your FCC Community ID is: PA3925

Phone Number 215-849-2730 **Account Number** 454-026-986-0001-78

Page 3 of 3

## Need- to- Know Information

Customer Proprietary Network Information (CPNI) Notice CPNI is information that relates to the type, quantity, destination, technical econfiguration, location, omegant of use, and beling laformation of your telecommunications or interconnected VolP services. This information is made evaluable to us solely by virtue of our retailorship with you. The protection of your information is important to us. Under federal law, you have a right, and we have a duty, to protect the confidentiality of your CPNI.

We may use and share your CPNI emeng our altitates and agents to offer you services that ere different from the services you currently purchase from us. Vertzon offers a full range of services such as video, wireless, Internet, and long distance. Visit vertzon.com for a complete listing of our services and companies.

You may choose not to have your CPNI used for the marketing purposes described above by calling us anytime at 1-866-483-9700. When you call, please have your bill and account number available. Your decision about use of your CPNI doesn't effect our provision of services to you nor eliminate all Vertzen merketing contacts.

Unless you call us at the number above, Vertran may use your CPNI to market different types of services beginning 30 days after the first time we notify you of the CPNI policy described above. You may elect at any time to add or remove a restriction on the use of your CPNI. Your choice remains valid until you change your election by calling the

## New Bill Payment Locations

You may now visit any participating Vericon Wheless location to pay your FIOS/Nome Phone bill utilizing the stores' bill payment idesk. The klosks except each, check, or credit card. To lind a payment location near you, visit verizon.com/paymenticotions. Verizon Wheless locations do not currently handle FIOS equipment returns.

## We Value You

We Value You Thank you for being a loyal Vortzon customer! We sincerely appreciate your business and look forward to continually providing you with the very best in entertalmount. Call us at 1 - 888 - 893 - 8090 to learn about new verys you can enjoy your services and save with Vertzon.

FIOS TV Programming Change in NY, NJ, PA On or after July 15, 2014, the content provider changed programming on Channet 477 from "WDVB Zuus Latino" to "WDVB Soul of the South", a new television network featuring a mix of African American programming including neves, dramas, comedies, feeture films, court shovis, music, documentaries, and talk shows.

## FIOS TV Programming Change

On or after November 17, 2014, "CBS Sports Network" SO (channel 94) and HO (chunnel 594) will no longer be available to Sports Package and Sports Pass subscribers. The channels will continue to be available to subscribers to the Wilmate HD and Extreme HO packenes.

**Account Number** 454- D26- 986- D001- 78 **Amount Due** \$157.90



Get More, Save More

Call 1- 688- 747- 5764 to ensure you're getting the bost Yertzon services at a greet value- from Phone, internet and TV to money- saving bundles, international plans and fun add- one. Together wo'll find ways to save you even more.

## **MOVING?**

Call Vertzon before you move to set up your internet, TV and phone for your new home. Plus, ask about our great new money-saving bundles, Don't wall. Call ahead to 1 - 866-896-6837, and be sure to ask if FIOS is available in your area! Service availability

Account Information Statement Date: 10/18/14 CHRISTOPHER KELLY Phone: 215-849-2730

Account Summary. \$157.80 Previous Balance - \$157,80 Payment Oct 13 \$.00 **Balance Forward** 

New Charges **Current Activity** \$160,29 Specials and Promotions - \$22.00 Yaxes, Governmental Surcharges and Fees \$8.04 Verizon Surcharges and Other Charges & Credits \$13.57 \$157.90 Total New Charges Due by Nevember 12, 2014

**Total Amount Due** 

\$157.90

Questions ábout your bill or service?

View your bills in detail at vertzon.com or call 1-800- VERIZON (1-800-837-4968). When acked for your account number, please enter 454-026-986-0001-78.

Customers with disabilities call 1-800-974-6008 TTY.

Please return remit allo with payment.

Account Number:

454-026-986-0001-78

Amount Due: \$157.90

101814

Make check payable to Vertzon

CHRISTOPHER KELLY 221 W OUVAL ST PHILA PA 19144- 2507

VERIZON PO BOX 920041 DALLAS TX 75392-C041

V5 454026986000178 00000000000 000000157909

Account Number

\$23.33

\$160,29

454-026-986-0001-78 215-849-2730 Taxes, Governmental Surcharges and Fees PA State and Local Sales Tex 10/19 11/18 Triple Play Bundle Includes: Yelecommunications Relay Service • FICS Digital Voice Unlimited 30.00 • FLOS TV Preferred HD 54.89 Tolai Taxes, Governmental Surcharges and 40.00 • FIOS Internet 25/25 Fees . Triate Exclusivo 24 Mo. Credit thru Aug 14, 2016 - 10.00

· Bundle 24 Mo. Credit - 25.00 thru Aug 14, 2016 (\$25.00 off Internet) 89.99 Triple Play Bundle Price 18.98 10/19 11/18 (Rent): 2 TV Equipment Peckage 22.00 10/19 11/18 FIOS Quantum TV - Enhanced Service 4.99 10/19 11/18 (Rent): Wirdosa Router Monthly Charges Subtotal \$136.08 Change in Service FIOS Internet Activation Fcc @ 69.99 Payment 3 23,33 of 3

Phone Number

FDV Administrativo Charge **Total Verizon Surcharges and Other Charges &** Credits

Verlzon Surcharges and Other Charges & Credits

Federal Universal Service Fee

Video Franchise Fce

Franchiso Related Costs

Regional Sports Newtork Fee

PA Gross Receipts Tex Surcharge

Regulatory Recovery Fee - Federal

\$157.90 **Total New Charges** 

Page

..2 of 3

4,98

.08

1.00

\$6.04

3.24

1,79

3.55

80.

1.50

2.42

.99

\$13,57

Specials and Promotions

Change in Service Subtotal **Current Activity Total** 

(\$10.00 off TV)

**Current Activity** 

Monthly Charges

10/18 11/18 FIOS TV Record & Store Service Credit Urru

- 22,00 Aug 14, 2016 (\$22.00 off TV)

- \$22,00 Specials and Promotions Total

## Legal Notices

Payment by Check

Puying by check stithculzes check processing or use of the check biformation for a one-time electronic fund transfer from your account. For all payments using bank account information, we may rotain the information to send you electronic refunds or anable your future electronic payments to us (to opt out, call 1 - 668 - 509 - 5356).

Late Payment Charges

To grad a late payment charge of 1,6% or \$5.00, whichever is greater, on Umpeld behances over \$20 payment must be received before Nov 20, 2014.

## Correngendenso

Go to verben com/contactus or mail to PO Rox 33078, St. Potorsharg, FL 33733

Closed Captioning Quastions and Concerns?

tinase depriming quantum and contents of captioning on a program, please call Yerkon at 1-860-VERIZOH. Written are respondence can be sent by fax to 1-888-808-7028, by email to videoclosed capitar. Prarizon.com, or by mail to Verizon, PO 86x 33052, St. Petersturg, FL 33701 After Cyntria Mareles, Manager.

## Service Providers

Vertzon PA prevides regional, local colling and related features, other value cervices, and FIOS TV services, unless otherwise indicated. Vertzon Long Distance provides long distance calling and other services identified by "VLD" in the applicable billed line Itom, Vertzon Online provides internet services, MAC services and FIOS TV equipment. FIOS to a registered mark of Vertzon Trademark Services 1.C.

## Sonkruntey Information

Control play intermination

If you are or vision in bankruptby, this statement may include encents for

pro-bentropicy service. You should not pay pro-bentropicy amounts, they are for
your information only. Mail bunkruptcy-related correspondence to 500 Technology

Drive, Suito 559, Welden Spring, LiO 63304.

Local Franchise Authority - FIOS TV City of Phila City Holf, 1400 JFK Blvd, Oix of Tech, Cable TV Linit, Ren 702, Phile, PA 19107, 216 686-2934, Your FCC Community ID le: PA3925

Phono Number 215-849-2730 Account Number 454-026-988-0001-78 Page 3 of 3

## Need- to- Know Information

Customer Proprietary Network Information (CPNI) Notice for Residential, Small and Medium Business Customers CPNI is information that relates to the type, quantity, destination, technical configuration, location, amount of use, and billing information of your telecommunications or interconnected VaiP services. This information is made available to us softly by virtue of our relationship with you. The protection of your information is important to us. Under federal law, you have a right, and we have a duly, to protect the confidentiality of your CPNI.

We may use and share your CPMI among our affiliates and egents to offer you services that are different from the services you currently purchase from us. Variant offers a full range of services such as video, vireless, internet, and long distance. Visit verken.com for a complete listing of our services and companies.

For redidential, small and medium business custamers, you may chaose not to have your CPNI used for marketing purposes doscribed above by calling us anytime at 1 - 865 - 483 - 9700. When you call, please have your bill and account number available. Your decision about use of your CPNI dossn't affect our provision of services to you not climinate all Verizon marketing contacts.

Unless you call us at the number above, Vertzen may use your CFNI to market different types of services beginning 30 days after the first time we notify you of the CFNI policy described above. You may elect at any time to add or remove a restriction on the use of your CFNI. Your charles valid until you change your clotton by calling the number above.

## Surcharges

Surcharges include:

- a Federal Subscriber Line and Access Recovery Charge applicable to state-to-state and international services that helps pay for the costs of providing and maintaining the local phone network:
- e Federal Universal Service Chargo applicable to state-to-state end international services to recover fees imposed on us by the government to support universal service;
- orderment to support was service;

  a Cerrier Cost Recovery Charge applicable to long distance
  customers that helps detray our costs for terratnating calls on
  other networks, fees paid to support government programs such
  as Totecommunications Relay Service and local number
  partability, and other Federal Communications
  Commission- assessed charges;
- a Long Distance Administrative Charge applicable to long distance customers to help defray account servicing costs for state- to- state and international calling;
- a Federal Regulatory Fee applicable to recover the annual per video subscriber fee payment made to the FCC; and,
- a FDV Administrative Charge applicable per FIOS Digital Voice tine to help defray account- servicing costs associated with providing voice services.

Please note that the surcharges are charges, not taxes. These charges, and what is included in these charges, are subject to change from time to time. For additional information regarding the charges on your Varizon bill, pleaso visit vortzon.com or call the number listed on your bill.

711 Relay Service Available in Pennsylvania

The Pennsylvania Yelecommunications Relay Service (PA YRS) offers persons who are deal, hard of hearing or speech disabled ways to communicate using the telephone. Both treditional relay and compliance telephone volce-carry-over relay services are available. Users simply did 7-1-1 to access PA TRS. The service is free and available 24 tious a day, every day of the year.

In addition, Pennsylvanians with disabilities may quotify for telecommunications devices to help them use tetephone services through the Telecommunication Device Distribution Program (TODP). This program is implemented by Pennsylvania's initiative on Assistive Technology (PIAT), a program of the institute on Disabilities at Temple University, in conjunction with the PA Office of Vecational Rehabilisation and the Pennsylvania Public Utility Commission (PUC). For more information on the TODP, or to download an application, visit PIAT's website at disabilities, temple, educyprograms/assistive/tddp.

711 is not an emergency number. Always dial 911 for emergencies. To learn more about TRS and 711, visit the PA PUC's website: pue.pa.gov/vi@ty\_industry/lelecommunications/lelecommunica

FUSF Surcharge Changes October 1, 2014

Your Federal Universal Sentee Fund (FUSF) surcharge may change on October 1, 2014. Authorized and reviewed quarterly by the FCC, the FUSF funds programs to keep local telephone rates affordable for all customers and provides discounts to schools, libraries, rural health care providers, and love income families.

TO OUR CUSTOMERS WITH REACT ALARM TRANSPORT SERVICE:

VERIZON TO TERMINATE REMOTE EMERGENCY ALARM CONDITION TRANSPORT (REACT) ALARM TRANSPORT SERVICE

Effective February 15, 2015, pending approval where required from applicable state Public Service Commissions, Verizon will discentitue Remote Emergency Atarm Condition Transport (REACT) Atarm Transport Service for all customers. Additionally, we will be grandiathering REACT Atarm Transport Service from all Product Guides, effective December 15, 2014. As a result of this grandfathering action, Verizon will continue to provide survice to extelling customers with REACT, but will no longer accept new orders (anchuding moves, adds, and changes) for the REACT service.

Uniass your service is under a term egreement which has not yet expired, your REACT Alarm Transport Service Feature billed against your Centrex, and or Verizon Tetophone Lines delivering the REACT service is subject to immediate termination following the February 15, 2015 disconfigurance date. Additionally, any related Voice Grade Data Private Line circuit between an atarm company location and a Verizon central office used to connect to REACT Alarm Transport Service aquipment, is also subject to termination.

Vertizon plans to seek regulatory approval, where regulard, to discontinuo these services on February 15, 2015. Once your contract form expires, and Vertizon has received all necessary approvals, these services will be terminated with advance written notice. You may terminate these services at any time.

Customers with REACT Alarm Transport Service should contect their Alarm service provider for alternative solutions for alarm monitoring services. For more information regarding this action, phases contact your Vertran Account Manager, or call Veitran Customer Care at the felt-free number reflected on this invoice.

215-849-2730 Primary Phone:

Account Number: 454-028-986-0001-78

Bill Date: December 18, 2015

## Account Summary

Theoretic Indicates a second second	<b>应制的原长区</b> 和	302	推歷
Previous Balance	135.34		
Payment Received - Thank You	-135.34	12/4	
Balance Forward	\$,00		

E.	Contemple of the state of the s		在京 发油炉
	Flos TV, Internet & Phone Bundle	89.99	12/19 - 1/18
	Additional Services & Equipment	24.97	12/19 - 1/18
	Fees & Olher Charges .	20.38	

## Total Due by January 12

\$135.34

To avoid a late payment charge, pay the total due by Jan 20, 2016. For TV, internet and wireless services, the late payment charge is \$5 or 1.5% of your total due, whichever is greater. For all other services, the late payment charge is 1.25%.

## Get answers fast

- · Click to chat at vertzon.com/liveagent
- Call 1.800.Verizon (1.800.837.4966)
- · Customera with disabilities call 1.800.974.6006 (voice or TT:Y)

## Take action

Your Flos TV Annual Notice is now available and can be found online at vertzon.com/notice. If you prefer to receive this information by mail contact us at 1.800, VERIZON (1,800.837,4966).



## Offers & benefits

We'll help set you up with internet, TV and phone services in your new home. We have saving options just for you. Don't forget to ask about Fios in your area, Call us at 1.866,896,6837. Service availability varies.

## Device protection

Crack your tablet screen? Drop your laptop? Crash your computer? No problem. Sign up for Verizon Device Protection Plan and we will repair or replace any covered device regardless of brand or age for Just \$9.99 a month (plus taxes). We've got you covered this holiday, Call 1.888.456.0039.



## · More ways to pay

Never be late again! Auto Pay at vortzon.com/ autopay and you're always on time, or use;

- verizon.com/payonline to make a single. online payment
- · My Fios app
- 1.800,837,4966 to pay by phone
- verizon.com/paymentiocations to pay in person

Send this stub with your payment

Account Number: 454-026-986-0001-78

. Total Due: \$135.34

121815

Make check payable to Verizon

CHRISTOPHER KELLY 221 W DUVAL ST PHILA PA 19144- 2607

VERIZON . PO BOX 920041 DALLAS TX 75392-0041

Primary Phone: 215-849-2730

Account Number: 454-026-986-0001-78

Bill Date: December 19, 2015

## My Verizon

Pay bills, upgrade or renew sorvices, get account support and check voice . mail at vertzon.com/myverizon.

## **Your Discounts**

	Price	Discounts	You Pay
	No. of the	SAME DE	
Flos TV Preferred HD	54.99	-10.00	44.99
Flos internet 25/25	40.00	-25.00	15.00
. Flos Digital Volce Unlimited	30.00		30.00
Bundlo Prico	\$124.99	-\$35.00	\$B9,99
STATUTE OF SHARE THE STATE OF T	id illelicon	(自治性)(1	學的學
Flos Quantum TV - Enhanced Service	22.00	-22.00	.00
Subtotal	,	-\$22.00	
Discounts This Month	9	-\$57.00	

TV discount expires 8/14/16.

TV discount expires 8/14/16. Internet discount expires 8/14/16.

Discounts have been applied to the Total Due shown on page 1.

# Fios Fast Facts Flos On Demand

 With thousands of Video On Demand titles, you can watch the movies and shows you want, whenever you want. Many are free. Press the On Demand button on your remote to browse avallable titles.



## International TV

Ask about our many International TV content packages-from Spanish language, to Mandarin, Portuguese, Korean and many others. Call us at 1.888.882.4375 and ask about service availability.

How can I review my bill in more detail?
Review your bill at verzon.com/billview. Select 'View Details'.

Flow do I sign up for paper free billing?

You can enroll in paper free billing at vertzon com/paperfree,

If a credit or adjustment is applied, where do I find this on my bill?

Credits and Adjustments are located on page 3 of your bill. It may take up to two billing cycles for credits to be applied to your account and appear on your bill. You can also visit, vertzon.com/billview. Simply click Payment/Adjustment History on left navigation.

Case JD: 160903521

Primary Phone: 215-849-2730

Account Number: 454-026-966-0001-78

Bill Date: December 18, 2015

## Get answers last

- · Click to chall at verizon.com/liveagent
- Call 1.800. Verizon (I.800.837.4966)
- Gustomers with disabilities call 1.800.974.6006 (voice or TTY)

## **Details of Current Charges**

Includes discounts shown on page 2.

## Harp to A. Shing in the California in the Califo

Your buildle includes Flos TV Preferred HD, Flos Internet 25/25 and Flos Digital Voice Unlimited

**Bundle Price** 

Subtotal

· \$89.99 12/19 - 1/18

\$24.97

12/19 - 1/18

Your monthly bundle price after the discounts shown on page 2 were applied.

# Equipment (Rent): 2 TV Equipment Package 19.98 (Rent): Wireless Rouler 4.99

Equipment and additional services to personalize your Flos service.

F	HORMOUTH CHARGES AND SALES		
kil	Taxes, Governmental Fees & Surc	harges	444,00
	PA Stele and Local Sales Tax	4.96	
	Telecommunications Relay Service	.08	
	E911	1.65	
	Verlzon Surcharges & Fees		
	Federal Universal Service Fee	3,36	
	PA Gross Receipts Tax Surcharge	1.79	
	Video Franchise Fee	3.55	
•	Regulatory Recovery Fee - Federal	,80,	
	Franchisa Related Costs	1.50	
	Regional Sports Network Fee	2.42	
	FDV Administrative Charge	.99	
	Subtotal	\$20.38	
Т	otal Due	\$135.34	

Includes both Verizon fees and . governmental taxes and fees. For details, visit verizon.com/taxesandfees.

Gass. ID: 160903521

Primary Phone: 215-849-2730 Account Number: 454-026-986-0001-78

Bill Date: December 16, 2015



Terms of Service Update Effective 1/17/16
The Verizon Internet, Flos TV, and Flos Digital Voice
Terms of Service will be updated effective January 17,
2018. Among other items, there is a change to the way
charges are billed upon termination of the service(s).
To view the Terms of Service, visit verizon.com/terms.

Verizon Remittance Address Change Notification Pleese be edvised that the payment address reflected in the remittance section of your bill will change.

Effective with January Invoices, payments should be mailed to the following address:

VERIZON PO Box 15124, Albany NY 12212-5124

If you submit check payments via online banking, please update your account with the new Vertzon payment address to ensure accurate delivery.

## **Customer Notices**

Customer Proprietary Nelwork Information (CPNI) Notice for Residential, Small and Modium Business Customers

CPNI is information that relates to the type, quantity, destination, technical configuration, location, amount of use, and billing information of your telecommunications or interconnected VoIP services. This information is mede available to us solely by virtue of our relationship with you. The protection of your information is important to us. Under federal law, you have a right, and we have a duty, to protect the confidentiality of your CPNI.

We may use and share your CPNI among our affiliates and agents to offer you services that are different from the services you currently purchase from us. Vertzon offers a full range of services such as video, wheless, internet, and long distance. Visit verizon.com for a complete tailing of our services and companies.

For residential, small and medium business customors, you may choose not to have your CPNI used for marketing purposes described above by calling us anytime at 1-866-483-9700. When you call, please have your bill and account number available. Your decision about use of your CPNI doesn't affect our provision of services to you nor eliminate all Verizon marketing contacts.

Unless you call us at the number above, Vertzon may use your CPNI to market different types of services beginning 30 days after the first time we notify you of the CPNI policy described above. You may elect at any time to add or remove a restriction on the use of your

CPNI. Your choice remains valid until you change your election by calling the number above.

## **Electronic Fund Transfor (EFT)**

Paying by check authorizes us to process your check or use the check information for e one-time EFT from your bank account. Verizon may retain this information to send you electronic refunds or enable your future electronic payments to us. If you do not want Verizon to retain your bank information, call 1-888-500-5358.

### Service Providers

Vortzon PA provides regional, local calling and related features, other voice services, and Flos TV service, unless otherwise indicated. Vertzon Long Distance provides long distance calling and other services identified by "VLD" in the applicable billed line tlem. Vertzon Online provides Internet service and Flos TV equipment. Flos is a registered mark of Vertzon Trademark Services LLC.

Local Franchise Authority - Flos TV City of Phile City Hall, 1400 JFK Blvd, Div of Tech, Cable TV Unit, Rm 702, Phile, PA 19107, 215 686-2934, Your FCC Community ID is: PA3925

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Correspondence

Go to varizon.com/contactus or mail to PO Box 5156, Tampa FL 33675.

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## Bankruptcy Information

If you are or were in bankruptcy, this hill may include emounts for pre-bankruptcy service. You should not pay pre-bankruptcy amounts; they are for your information only. Mall bankruptcy-related correspondence to 500 Technology Drive, Suite 550, Weldon Spring, MO 63304.

ርብኔ¢ JD: 160903521

CHRISTOPHER KELLY
Primary Phone: 215-849-2730

Account Number: 454-026-986-0001-78

Bill Date: January 18, 2016

## Account Summary

Total Due by February 12

(Incidentification)	23	和自己的	2018年20年
Previous Belance		135.34	
Payment Received - Thank You		-135.34	1/5
Bajance Forward		\$.00	

Continue of the same	the telescope	<b>建筑建筑</b>
Flos TV, Internet & Phone Bundle	89.99	1/19 - 2/18
Additional Services & Equipment	24,97	1/19 - 2/18
Fees & Other Charges	20.73	*
•		

\$135.69

To avoid a lete payment charge, pay the total due by Feb 20, 2016. For TV, internet and wireless services, the late payment charge is \$5 or 1.5% of your total due, whichever is greater. For all other services, the late payment charge is 1.25%.

### Gel answers last

- · Click to chat at verizon.com/liveagent
- Call 1.800.Verizon (1.800.837.4966)
- Customers with disabilities call 1.800.974.6006 (voice or TTY)

# Offers & benefits

## Moving?

We'll help set you up with internet, TV and phone services in your new home. We have saving options just for you. Don't forget to ask about Flos in your area. Call us at 1.868,896,6837. Service availability varies.

## Device protection

Crack your tablet screen? Drop your laptop? Crash your computer? No problem. Sign up for Verizon Device Protection Plan and we will repair or replace any covered device regardless of brand or age for just \$9.99 a month (plus taxes). We've got you covered this holiday. Call 1.888.456.0080.



## More ways to pay

Never be late again! Auto Pay at verizon.com/ autopay and you're always on time, or use:

- verizon.com/payonline to make a single online payment
- · My Flos app
- 1.800.837.4966 to pay by phone
- verizon.com/paymentiocations to pay in person

Send this stub with your payment

Account Number: 454-026-986-0001-78

Total Due: \$135.69 · DllAlb

Make check payable to Verizon

\$

CHRISTOPHER KELLY 221'W OUVAL ST PHILA PA 19144- 2507

VERIZON PO BOX 15124 ALBANY NY 12212-9124

Primary Phone: 215-849-2730

Account Number: 454-026-986-0001-78

Bill Date: January 18, 2016

## Get peace of mind

Protect your new and old devices with the Verizon Device Protection Plan. Visit verizon.com/devicecoverage.

## Your Discounts

•	Price	Your Discounts	'Amount . You Pay
Manufalla de Comina de La Comina			
Flos TV Preferred HD	54.99	-10.00	44.99
Flos Internet 25/25	40.00	-25.00	15.00
Flos Digital Voice Unlimited	30.00	9	30.00
Bundle Price	\$124.99	-\$35.00	\$89,99
CARDINOTERS CONTRACTE OF DEPT	ien Weit ook	ne service	高是 <b>以</b> 對
Flos Quantum TV - Enhanced Service	22.00	-22.00	.00
Subtotal		-\$22.00	
Discounts This Month		-\$57.00	

TV discount expires 8/14/16.

TV discount expires 8/14/16. Internet discount expires 8/14/16.

Discounts have been applied to the Total Due shown on page 1.

# Verizon Fast Facts Visual 411 App

Get local business listings, coupons, reviews, maps, directions and much, much morel Search by category, business name, keyword or coupon. Visit verizon.com/visual411 for details.



## International TV

Ask about our many international TV content packages from Spanish language, to Mandarin, Portuguese, Korean and many others. Call us at 1.888.992,8111 and ask about service availability.

## (4) San Made Market Surger Str. Str.

Why does my bill fluctuate?

Your bill amount fluctuates when you:

- · Request a change to your service
- Purchase or rent movies
- · Use directory assistance .
- Make calls outside of your calling plan
- · Receive a promótional credit
- · Lose a promotional credit
- · Receive a price change

How can I request a duplicate bill?

Duplicate bills can be downloaded and printed at vertzon.com/billview.

What is the balance that I currently owe?

You can review your most current balance information online at verizon.com/billview or you can follow the prompts at 1.800,VERIZON.

Gase 10: 160903521

215-849-2730 Primary Phone: Account Number: 454-026-986-0001-78

Bill Date: January 18, 2016

Get answers fast

- · Cilck to chat all verizon.com/liveegent
- · Call 1,800. Verizon (1,800.837.4966)
- · Customers with disabilities call 1.800.974.6006 (voice or TTY.)

## **Details of Current Charges**

Includes discounts shown on page 2.

# THOS IN HIMEITH IS THE HOLD BUILDING TO THE THE SECOND STATE OF TH

Your bundle includes Flos TV Preferred HD, Flos Internet 25/25 and

Bundle Price

Subtotal

Subtotal

1/19 - 2/18 \$89,99

1/19 - 2/18

\$24.97

\$20.73

Flos Digital Voice Unlimited

Accident Starting City of Michigan Co. Equipment (Ront): 2 TV Equipment Peckage 19.98 (Rent): Wireless Router 4.99

Your monthly bundle price after the discounts shown on page 2 were applied.

Equipment and additional services to personalize your Flos service.

VEGGEVE STORMER CHARGES STANKE AND	
Taxes, Governmental Fees & Surc	harges
PA State and Local Sales Tax	4.99
Telecommunications Relay Service	`.08
E911	1.65
Verizon Surcharges & Fees	
Federal Universal Service Fee	3.66
PA Gross Receipts Tax Surcharge	1,81
Video Franchiso Fee	3.55
Regulatory Recovery Fee - Federal	.BO.
Franchise Related Costs	1.50
Regional Sports Network Fee	- 2.42
FDV Administrative Charge	,99

Includes both Verizon fees and governmental taxes and fees. For details, visit vertzon.com/taxesandfees.

\$135.69 **Total Due** 

CHRISTOPHER KELLY
Primary Phonie: 215-849-2730
Account Number: 454-026-986-0001-78

Bill Date: January 18, 2016



Changes to Directory Listing Services On March 19, 2016, the monthly price is changing for the following service; Non-Published Service from \$4.75 to \$4.90

Verizon values your business and offers many services that can enhance your Internet, TV and phone experience.

Changes to Directory Assistance Service
On March 19, 2016, the price for Directory Assistance
is increasing from \$2.49 to \$2.75 per call. Verticon
values your business and offers many services that
can enhance your internet, TV and phone experience.

## Surcharges

Surcharges include:

- a Federal Subscriber Line and Access Recovery Charge applicable to state-to-state and international services that helps pay for the coals of providing and maintaining the local phone network;
- a Federal Universal Service Charge applicable to state-to-state and International services to recover fees imposed on us by the government to support universal service;
- a Carrier Cost Recovery Charge applicable to long distance customers that helps defray our costs for terminating calls on other networks, fees paid to support government programs such as Telecommunications Relay Service and local number portability, and other Fodoral Communications Commission-assessed charges;
- a Long Distance Administrative Charge applicable to long distance customers to help defray account servicing costs for state-to-state and international calling;
- a Federal Regulatory Feo applicable to recover the annual per video subscriber fee payment made to the FCC; and,
- a FDV Administrative Charge applicable per Flos Digital Voice line to help dofray account-servicing costs associated with providing voice services.

Please note that the surcharges are charges, not laxes. These charges, and what is included in these charges, are subject to change from time to time. For additional information regarding the charges on your Verizon bill, please visit verizon.com or call the number listed on your bill.

FUSF Fee Changes January 1, 2016
Your Federal Universal Service Fund (FUSF) fee may change on January 1, 2018. Authorized and reviewed quarterly by the FCC, the FUSF funds programs to keep local telephone rates affordable for all customers and provides discounts to schools, libraries, rural health care providers, and low-income families.

## **Customer Notices**

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Notice for Residential, Small and Medium Business
Customers

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## Electronic Fund Transfer (EFT)

Paying by check authorizes us to process your check or use the check information for a one-time EFT from your bank account. Verizon may retain this information to sond you electronic refunds or enable your future electronic payments to us. If you do not want Verizon to retain your bank information, call 1-888-500-5358.

## Service Providers

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CHRISTOPHER KELLY
Primary Phone: 215-849-2730
Account Number: 454-026-986-0001-78

Bill Date: January 18, 2016

Local Franchise Authority - Flos TV City of Phila City Hail, 1400 JFK Blvd, Div of Tech, Cable TV Unil, Rm 702, Phila, PA 19107, 215 686-2934, Your FCC Community ID is: PA3925

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## Gel answers fast

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- · Click to chat at verizon.com/livoagent
- · Cali 1.800. Verizon (1.800.837.4966)
- Customers with disabilities call 1.800.974.6006 (voice or TTY)

\$135,69

CHRISTOPHER KELLY
Primary Phone: 215-849-2730
Account Number: 454-026-986-0001-78
Bill Dato: February 18, 2016

### Get answers fast

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- Call 1,800. Verlzon (1,800.837.4966)
- Customers with disabilities call 1,800.974.8006 (voice or TTY)

## **Account Summary**

. Total Due by March 14

Provide Paradical Science (1997)		
Previous Balance -	135.69	
Payment Received - Thank You	-135.69	2/4
Balance Forward	\$.00	
Charles and the second		
Flos TV, Internet & Phone Bundle	89.99	2/19 - 3/18
Additional Services & Equipment	24.97	2/19 - 3/18
Fees & Other Charges	20.73	

To avoid a late payment charge, pay the total due by Mar 22, 2016. For TV, internet and wireless services, the late payment charge is \$5 or 1.5% of your total due, whichever is greater. For all other services, the late payment charge is 1.25%.

## Offers & benefits

## Set you DVR free

As a Flos Quantum TV customer, you can stream your favorite DVR shows on select devices anytime, almost anywhere with the Flos Mobile app. You can also take live TV channels with you virtually anywhere. Download the app today. Flos Internet & Vertzon router required.

## Premium channels

Check out new and returning series for the best in entertainment at home or on the go, like Vinyl on HBO®, Black Salls on STARZ®, Billions on SHOWTIME® and more. Call us at 1.886.495.8254, or go to channel 860 to check out our offers. Availability varies and restrictions apply.

## Maximize your speed

Get even more blazing speed to do more online and watch your devices fly. Upgrade to Fios Quantum 50/50 Mlps Internet for just \$10 per month more. Call us at 1.888.656.8111. Limited-time offer. Speeds not available in all areas. Taxes apply.



## More ways to pay,

Never be late again! Auto Pay at verizon.com/ autopay and you're always on time, or use:

- verizon.com/payonline to make a single online payment
- · My Fice app
- 1.800.837.4966 to pay by phone
- verlzon.com/paymentlocations to pay in person

Send this stub with your payment

Account Number: 454-026-986-0001-78
Total Due: \$135.69

Make check payable to Verlzon

\$

CHRISTOPHER KELLY 221 W DUVAL ST PHOLA PA 19144- 2507

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 CHRISTOPHER KELLY
Primary Phono: 215-849-2730
Account Number: 454-026-986-0001-78

Bill Date: February 18, 2016

## Optimize speed

Get faster WI-FI speeds and maximize your entertainment with Flos at vertzon.com/speedoptlmizer.

## Your Discounts

	Price	Discounts	YouPay
Dimelia Discontinua 22 2019	能得的接近的	Name of the same	<b>多是不多</b>
Flos TV Preferred HD	54,99	-10.00	44.99
Flos Internet 25/25	40.00	-25.00	15.00
Flos Digital Voice Unlimited	30.00		30.00
Bundle Price	\$124.99	-\$35.00	\$89.99
Additional Southers and printing	in leterojimes	可能的學	444
Flos Quantum TV - Enhanced Service	22.00	-22,00	.00
Subtotal _		-\$22.00	
Discounts This Month		-\$57.00	

Discounts have been applied to the Total Due shown on page 1.

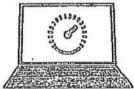
TV discount expires 8/14/16. Internet discount expires 8/14/16.

TV discount expires 8/14/16.

## **Fios Fast Facts**

## **Test Your Internet Speed**

Put your Flos Internet connection to the test! Learn about the speed range of your Flos service by visiting verizon.com/ checkyourspeed.



## **AccuWeather**

AccuWeather is now even better. Get local hourly and special events forecasts, Real Feel® Temperature and other local and regional updates. Plus new MinuteCast®, a minute-by-minuto precipitation forecast for key local landmarks. Tune to channel 619 in HD or 119 in SD today.



How can I make a payment arrangement?

 Please visit us at verizon.com/bilipay and select Payment Arrangement under Payment Actions.

Where do I find Flos Digital Voice options on my Fios TV?

- From the Flos TV Main Menu, click on "Flos Digital Volce" and "OK"
- View your call logs and listen to voice mail messages
- Enable features like Caller ID on TV, Simultaneous Ring, Call Forwarding, Incoming Call Block, and Do Not Disturb
- Refer to your user guide for dotails at vertzon.com/fiosvolco/userguida

What are the Taxes, Surcharges, and Fees on my bill?

Your bill includes federal, state and local taxes, governmental surcharges and fees as well as Verizon surcharges and fees. These charges vary depending on what products and services you have and in which state you use these products and services. For more information go to verizon.com and type "taxes and charges" in the search box.

മുള്ള ID: 160903521

**CHRISTOPHER KELLY** Primary Phone: 215-849-2730 Account Number: 454-026-985-0001-78

Bill Date: February 18, 2016

Get answers last

- · Click to chat at verizon.com/liveagent
- Call I.800, Verizon (i.800.837.4966)
- · Customers with disabilities call I.800.974.6008 (volco or TTY)

## **Details of Current Charges**

Includes discounts shown on page 2.

hirestychnicolat & Phonethonolesses See 1950 2

Your bundle includes Flos TV Preferred HD, Flos Internet 25/25 and Flos Digital Voice Unlimited

Bundle Price

\$89.99

Your monthly price after the discounts shown on page 2 were applied.

2/19 - 3/18 Auditional Scalings (Auditionical Asset Equipment

(Rent): 2TV Equipment Package

19.98

(Rent): Wireless Router

4.99

Subtotal

\$24.97 2/19 - 3/18 Equipment and additional services to personalize your Flos service.

(RESECTION CONTROL FOR THE SECTION OF THE SECTION O Taxes, Governmental Fees & Surcharges 4.99 PA State and Local Sales Tax , BO. Telecommunications Relay Service 1.65 E911 Vorizon Surcharges & Fees Federal Universal Service Fee 3.66 PA Gross Receipts Tax Surcharge 1.81 VIdeo Franchise Fee 3.55 Regulatory Recovery Fee - Federal .08

Includes both Vortzon fees and governmental taxes and focs. For details, visit verizon.com/taxesendfees.

Franchise Related Costs 1.50 Regional Sports Network Fee 2.42 FDV Administrative Charge .99 Subtotal \$20.73 **Total Due** \$135.69

Gaso ID: 160903521

Primary Phone: 215-849-2730

Account Number: 454-026-986-0001-78

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இலை ID: 160903521